

**CALIFORNIA COASTAL COMMISSION**

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**Th19a**

**PWP-3-VTP-21-0003-1**

**SANTA CRUZ COUNTY RESOURCE CONSERVATION  
DISTRICT**

**JULY 7, 2021**

**CORRESPONDENCE**

**BOARD OF FORESTRY AND FIRE PROTECTION**

THE NATURAL RESOURCES AGENCY  
STATE OF CALIFORNIA

**KEITH GILLESS, CHAIR**

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Gavin Newsom, *Governor*

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Madeline Cavalieri  
Statewide Planning Manager  
California Coastal Commission  
725 Front Street, Suite 300  
Santa Cruz, CA 95060  
Via email

July 7, 2021

Dear Ms. Cavalieri,

The Board of Forestry and Fire Protection staff appreciate this opportunity to provide further information regarding the CalVTP's purpose, goals, and environmental protections.

In the last five years alone, wildfires have burned a staggering 180,151 acres of land within the coastal zone subject to the Coastal Act of 1976. Last year, almost 1,500 structures were lost in the CZU Complex fire that burned 86,509 acres in Santa Cruz and San Mateo counties. As such, the Board is an enthusiastic advocate for responsible vegetation management projects within the coastal zone.

As California continues to shatter wildfire records on an annual basis, increasing the pace and scale of wildfire resilience is imperative to both climate resilience and public safety. The state is embracing new strategies for wildfire prevention that utilize appropriate vegetation treatment activities to preserve and maintain natural ecological balance and restore natural wildfire regimes. Under Executive Order B-52-18, former Governor Jerry Brown set a goal for the Natural Resources Agency to treat 500,000 acres of vegetation per year to reduce wildfire risk. Even more recently, the Governor's California Wildfire and Forest Resilience Task Force released its Wildfire and Forest Resilience Action Plan, which calls upon state agencies to increase the pace and scale of forest health and wildfire prevention projects. Key components of this goal include reducing regulatory burdens and streamlining permitting processes.

As part of this statewide effort, the Board developed and implemented the California Vegetation Treatment Program, commonly known as the CalVTP. The CalVTP includes robust environmental analysis across many vegetation types across the state to support the use of prescribed burning, mechanical and manual treatments, herbicides, and prescribed herbivory as tools to reduce hazardous vegetation and to restore healthy fire regimes by restoring and maintaining ecological balance. The CalVTP streamlines California Environmental Quality Act compliance for vegetation projects under a Programmatic Environmental Impact Report (PEIR) certified by the Board in December

2019. The CalVTP PEIR provides a powerful tool to expedite the implementation of vegetation treatments to reduce wildfire risk while conserving natural resources.

A core purpose of the CalVTP is restoring and maintaining ecological balance in sensitive areas, including the coastal zone, thereby also establishing less destructive natural fire regimes in those areas. Although the CalVTP is a statewide program, its goals are consistent with, and actively further, those of the Coastal Act to “protect the ecological balance of the coastal zone and prevent its deterioration and destruction” and to “[p]rotect, maintain,...enhance and restore the overall quality of the coastal zone.”

As explained in Section 1.1 of the Final PEIR, vegetation treatment at the landscape scale as proposed under the CalVTP is focused on reducing the likelihood of a ground fire increasing in intensity and on helping fire responders more easily contain a wildfire. Although vegetation treatments under the CalVTP may not be able to slow or halt the forward advance of extreme wind-driven wildfires during periods of high-wind conditions, the large majority of wildfires that occur within the state are not highly wind driven, and the proposed vegetation treatments can slow and help suppress them by reducing the risk that ground burns will climb to crown fires in forests, providing improved access to fire in fuel breaks, and slowing fire movement by reducing levels of fuel. Although vegetation treatments alone may not reduce wildfire risks for all large wind-driven fires, it does not diminish the need to reduce overall wildfire risk and to prevent and suppress fires within the State Responsibility Area (SRA).

As discussed Section 3.17.1 of the Final PEIR, vegetation treatment is the primary approach to wildfire management because it can reduce the intensity and severity of wildfire, slowing fire movement and creating favorable conditions for firefighting to protect targeted, high-value resources. Fuel reduction has proven successful where it is targeted at protecting specific resources in limited geographic areas, such as in areas of extreme fire danger or in the WUI. Fuel treatments also promote faster postfire forest recovery by causing less damage to soils and leaving some live vegetation within burn areas (USFS 2009), increasing seedling regeneration, protecting resources such as soils, wildlife, riparian function, and wetlands, and reducing drought-related tree mortality.

Proposed treatments in chaparral and coastal sage scrub vegetation communities would be tailored in consideration of the site-specific vegetation conditions and environmental resources, as well as the objectives of the proposed treatment type.

Shortened fire return intervals have been identified as a primary driver of type conversion from chaparral and coastal sage scrub vegetation types to vegetation types dominated by nonnative herbaceous vegetation in southern California. Implementation of the requirements under the PEIR would avoid environmental effects of type conversion of chaparral and coastal sage scrub by designing treatment projects to replicate the natural fire regime, return the vegetation type to its natural condition class, and maintain or improve the natural habitat function of those alliances. Environmental effects of type conversion considered in the Draft PEIR relate to whether a substantial reduction in the function of affected habitats would occur.

The CalVTP project proponent will design treatment projects to avoid type conversion where native coastal sage scrub and chaparral are present. Because a legislative or regulatory definition of “type conversion” has not yet been formulated, an ecological definition of “type conversion” has been developed to guide the CalVTP PEIR environmental analysis: a change from a vegetation type dominated by native shrub species that are characteristic of chaparral and coastal sage scrub vegetation alliances to a vegetation type characterized predominantly by weedy herbaceous cover or annual grasslands. While this definition is suitable for environmental analysis, it does not have application outside of the PEIR. For the PEIR, type conversion is considered in terms of habitat function, which is defined here as the arrangement and capability of habitat features to provide refuge, food source, and reproduction habitat to plants and animals, and thereby contribute to the conservation of biological and genetic diversity and evolutionary processes. Some modification of habitat characteristics may occur without type conversion, provided habitat function is maintained (i.e., the location, essential habitat features, and species supported are not substantially changed).

The PEIR definition is used in the analysis of the following impacts, which address resources pursuant to CEQA (State CEQA Guidelines Appendix G and Section 15380):

- ▶ Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications
- ▶ Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation That Leads to Loss of Habitat Function
- ▶ Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries
- ▶ Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife, Including Nesting Birds

The “terminal condition” of type conversion (i.e., a vegetation type characterized predominantly by weedy herbaceous cover or annual grasslands) is not used as a significance threshold, because the type conversion prohibition is not a part of the CEQA statute. Rather, impact determinations consider whether there is a substantial reduction in the value or function of affected habitats, which considers the loss of biodiversity.

We look forward to collaborating with the Coastal Commission to streamline permitting for CalVTP projects in the coastal zone.

Sincerely,



Edith Hannigan  
Land Use Planning Program Manager



July 7, 2021

California Coastal Commission  
455 Market St., Suite 300  
San Francisco, CA 94105

Via email to: [NorthCentralCoast@coastal.ca.gov](mailto:NorthCentralCoast@coastal.ca.gov)

Cc: [CentralCoast@coastal.ca.gov](mailto:CentralCoast@coastal.ca.gov)

Re: Opposed to San Mateo County Public Works Plans, July 2021 – Thursday Agenda Items Th16a

Dear Commissioners and Staff,

The Loma Prieta Chapter of the Sierra Club represents approximately 20,000 members and supporters in San Mateo, Santa Clara, and San Benito Counties.

We urge you to deny certifying, or at least delay certifying the San Mateo County (Th16a) Forest Health and Fire Resilience Public Work Plan (PWP). The Th16a PWP would likely lead to significant environmental harm to native habitat along San Mateo County's coast.

San Mateo County's coast is comprised of grasses, farmland, coastal scrub, mixed Douglas fir and redwood conifer forests and a half-dozen, mostly small towns. Fuel reduction, with its reliance on herbicides, masticators, bulldozers, and chainsaws, will damage our beautiful wildlands and destroy biodiversity without reducing fire risk.

California's coastal forests historically burn large, high-intensity infrequent wildfires. The 2020 CZU Lightning Complex Fire was such a natural event, one of the infrequent severe fires that comes to San Mateo County coast. In the same region, the 178,000-acre Marble Cone Fire burned in 1977 and an unnamed 150,000-acre fire burned the same area in 1906. No amount of native vegetation management would have altered the course of the CZU Lightning-Complex fire.

Dense, impenetrable stands of chaparral and sage brush is the natural condition for such habitat. Altering native shrublands by removing portions is highly destructive and may lead to conversion of shrubland to grasses.

The Th16a PWP is based on CalFire's Vegetation Treatment Program (CalVTP), which provides one fuel reduction program for all State Responsibility Areas (SRA) in California, whether they are in the Sierras, the North Coast, Southern California, or San Mateo County. One response does not fit all. CalFire and the press have managed to convince the public that

the fuel reduction, that the timber industry seeks for their remote commercial forests, will make all Californians safer.

The San Mateo County (Th16a) Forest Health and Fire Resilience Public Work Plan (PWP) is not a fitting response to the state's increased wildfire risk. The solution to reducing fire risk to human communities is to make structures less flammable and to reduce vegetation around the vulnerable structures. In addition, the state and all countries must escalate their efforts to reduce greenhouse gas emissions, that caused climate change and our increased our fire risk (through increased heat, reduced rain, and increased winds).

Yours truly,

A handwritten signature in black ink that reads "Karen Maki". The signature is written in a cursive, flowing style.

Karen Maki  
Forest Protection Committee Chair  
Loma Prieta Chapter Sierra Club

Cc: James Eggers  
Executive Director  
Loma Prieta Chapter Sierra Club

Gladwyn d'Souza  
Conservation Committee Chair  
Loma Prieta Chapter Sierra Club

Mike Ferreira  
Chapter Political Chair  
Loma Prieta Chapter Sierra Club



July 4, 2021

California Coastal Commission

**Re: Opposed to San Mateo County and Santa Cruz County Public Works Plans,  
July 2021 – Thursday Agenda Items Th16a, Th19a**

Dear Commissioners and Staff,

We are urging you to deny certifying, or at least delay certifying, both the San Mateo County (Th16a) and Santa Cruz County (Th19a) Forest Health and Fire Resilience Public Works Plans (PWP).

**We are asking for this delay because both PWPs, if approved, will likely lead to significant environmental harm to native habitats along the coastal zone.**

The Commission needs more time to hear from the scientific and environmental communities in order to properly assess the negative environmental impacts of these PWPs and the incorrect assumptions contained within the associated staff reports.

We greatly respect the staff's work on these items, but there are some fundamental errors in the reports that may have influenced the decision-making process. These errors are not of the staff's making, but rather erroneous assumptions and scientifically unsound statements that likely originated from various state departments, especially Cal Fire, concerning fire ecology and wildfire safety.

Specifically, both reports for the PWPs are based on the following errors:

1. Mischaracterization of coastal zone habitats.
2. Mischaracterization of fire suppression impacts.
3. Assuming the CalVTP will provide adequate mitigation measures to prevent the destruction of native habitat.
4. Assuming that clearance of habitat is the answer to community fire safety.

## Mischaracterization of habitat and fire suppression

The justification for approving both PWP's is based primarily on a scientifically incorrect claim. Specifically,

*“For the last century, fire suppression, and more recently, climate change, have resulted in unhealthy forests that set the stage for disease, pest infestations, and larger and more intense fires than would naturally occur in the absence of human interventions. Fire suppression has resulted in many forests characterized by dense overgrowth including too many trees and an unnaturally thick and impenetrable understory.”*

First, much of the natural landscape being targeted by both PWP's is **characterized by native shrublands, such as chaparral and coastal sage scrub, and non-native grassland, not mixed-conifer forests** from which the above characterization was derived.

Secondly, **while the above characterization may be applicable to some forests that have been severely damaged by prior logging activities in the western Sierra Nevada, it is completely false for the coastal zone for both forested and non-forested plant communities.** The science is very clear on this - the natural fire return interval of the coastal zone is extremely long, on the order of a century or more. This is much longer than the era of modern fire suppression.

Unfortunately, due to the over generalization of fire ecology by both government agencies and the press, California wildfires are seen solely through the lens of mixed-conifer forest ecosystems when in fact the majority of the state's most devastating wildfires (lives lost, homes destroyed) have had little to do with such forests. As a consequence, forest management principles and assumptions designed for timber production (not the preservation of ecologically healthy native habitats) are misapplied to habitats where conifers either don't exist or represent a small percentage of the targeted landscape.

The California coastal zone has one of the lowest lightning frequencies in North America, the natural source of ignition. While yes, the reports are correct in that coastal habitats have evolved with fire, these systems could not have survived the higher fire frequencies the reports are implying existed in the past. **Large, high-intensity, infrequent wildfires are the normal condition for the coastal zone in question.**

Therefore, despite what is popularly assumed, the 2020 CZU Lightning Complex Fire was an expected, natural event. It repeats the historical pattern of large, high-intensity wildfires in the region which includes the 178,000-acre Marble Cone Fire in 1977 and an unnamed 150,000-acre fire that burned the same area in 1906. Other large fires in the region have been recorded even earlier.



The large fires that burned in 2020, having mostly been ignited by lightning under a record-breaking heatwave, are an inevitable component of our unique landscapes in California. **No amount of native vegetation management could have altered the course of these events**, because the overriding factor has been weather (though the presence of non-native grasses has been important as well).

The CZU Lightning Complex Fire in Big Basin [largely self-extinguished](#) due to an increase in humidity. And these particular redwood forests in which the fire burned naturally have a mean fire interval of approximately 135 years. The last fire in a large portion of this area was in 1904 – so the fire-free period has actually been well within the normal range.

Why is this all of this important? Because both reports concerning the two PWP's support habitat clearance projects based on the false claim that coastal zone ecosystems are unnaturally clogged with dense vegetation due to incorrect assumptions about fire suppression impacts and therefore need ecological restoration. While prescribed burning in some forest settings can be ecologically beneficial, the one-size-fits-all approach of the CalVTP and the PWP's will likely lead to the inappropriate use of fire and other habitat clearance techniques, leading to ecological damage.

Equally troubling is the mischaracterization of native habitat as if it's some kind of dangerous growth that must be checked, rather than something to value. For example, the reports say,

*“Recent wildfires have demonstrated that **if vegetation is allowed to grow unchecked**, it becomes a hazard not only for an individual property, but for the neighboring properties, surrounding community, and adjacent natural areas.”*

Native coastal habitats are vibrant sources of life that support the state's priceless biodiversity. Habitat is not *fuel* – viewing it as such only desensitizes us to the ecological loss that occurs when herbicides, masticators, bulldozers, and chainsaws are used to turn wild habitat into managed gardens.

Dense, impenetrable stands of native shrubs are the natural condition for shrublands like chaparral and sage scrub. Understory shrubbery and dead wood in forests create valuable habitat for native animals – this is especially true with fire return intervals of a century or more like those of the redwood-Doug fir forests along the coastal zone.

Contrary to what is continually reported in the news media, post-fire shrubland and forest environments are rich, vibrant ecosystems. They are not destroyed landscapes. The problem we face is impatience. Yes, climate change is increasing the flammability of California. But the answer is not to clear the natural environment – the solution favored by Cal Fire.

**The solution to reducing fire risk to human communities is to make those communities fire safe themselves by proper planning, retrofits, and vegetation**

**management directly around vulnerable structures**, not by converting biodiverse wildlands into unnatural, park-like landscapes.

### **The CalVTP is environmentally destructive**

The reports claim that the CalVTP programmatic EIR,

*“...provides a comprehensive framework for implementing vegetation treatment projects through the adherence to Standard Project Requirements and Mitigation Measures that will result in the avoidance and minimization of adverse impacts to environmental resources.”*

This claim is dangerously false. The CalVTP advocates for the wholesale clearance of native shrublands far distant from communities at risk. This will increase the chance of type conversion (extirpation) of native shrublands by adding yet another stressor on the system, a point the CalVTP acknowledges itself. In addition, such an approach will do nothing to protect communities from the wildfires that kill the most people and burn nearly all the homes – those that are wind-driven. Even the CalVTP admits vegetation treatments will prove ineffective under such conditions.

Secondly, by applying the Sierran mixed-conifer fire suppression paradigm to coastal zone forests, as both the CalVTP and the reports do, ecologically inappropriate management strategies are likely to be implemented.

The CalVTP also fails to properly address the threat of type conversion of native shrublands as a consequence of habitat clearance and logging projects in a manner that is consistent with science and state law.

How the CalVTP defines type conversion is a testament to obfuscation.

After nearly two decades of resistance in previous drafts, the current CalVTP acknowledges the threat of type conversion due to too frequent fire. However, it improperly defines type conversion by limiting it to the terminal condition (shrubland to grassland), rather than considering the actual process that begins with reduced biodiversity. Then, mitigation measure SPR BIO-5 within the CalVTP rejects even this definition and creates an impossibly ambiguous one based on “habitat value,” a subjective measurement that will be determined by the “project proponent.” This presents a clear conflict of interest and passes off the determination of a key environmental impact of a project to a future, unknown entity.

Under such a definition, there is nothing to preclude a project proponent from converting native shrubland to non-native grassland in order to “improve” the habitat value for deer. Such projects have been implemented in the past by Cal Fire and the US Forest Service.

The CalVTP attempts to explain this ambiguity by claiming it is beyond its scope to define type conversion properly. This is absurd. The contention that a programmatic EIR cannot establish a proper definition of type conversion is contrary to the huge body of research and a violation of California Environmental Quality Act (CEQA) guidelines.

Since an approved programmatic EIR allows project proponents like San Mateo and Santa Cruz Counties avoid scrutiny of projects by the public and independent researchers who would normally have opportunities to comment and/or object through CEQA, the PWP's under consideration are basically blank checks to Cal Fire and other habitat clearance interests.

It is for these and many other reasons we are challenging the CalVTP in court. It is based on bad science. Please see [our letter to the California Board of Forestry](#) concerning the CalVTP for additional details.

### **Clearing habitat is not the answer to fire risk reduction**

Finally, the PWP's will be based on the false assumption that habitat clearance is the most effective way to protect communities.

*“...the CalVTP PEIR serves as the primary analysis tool to help reduce risks to life, property, and natural resources by targeting vegetation reduction and/or modification in the State Responsibility Area (SRA)...”*

We have shown through extensive documentation that such an approach will not only fail to address the wind-driven wildfires that cause nearly all the fatalities and home losses in California, but may make the situation worse by spreading flammable, invasive weeds and destroying intact ecosystems. Please see our attached [letter to the California State Legislature](#) for additional details.

### **Extra time needed to establish science-based policy**

The two proposals in question are just the beginning of a massive effort to remove or alter natural habitats throughout California, with the coastal zone being especially vulnerable.

Outside of climate change and destructive logging/clearance practices of federal public lands in California, Cal Fire and the CalVTP present the most dire threats to native habitats throughout the state. Beyond the courts, the Commission provides one of our best hopes to check the unrestrained ambitions of the biomass industry, habitat clearance contractors, timber interests, and the Cal Fire bureaucracy.

The Coastal Commission has always provided the bright light of truth in a foggy sea of self-interest and bureaucratic bungling. Despite efforts to influence it, to weaken it, and to

change its mission, the Commission has held true to its purpose – protecting nature along the coastal zone, helping Californians access that nature, and protecting nature in the face of powerful interests.

Therefore, we urge the Commission to deny or postpone any decision on the proposed PWP's of San Mateo and Santa Cruz Counties. Both are based on a failed Cal Fire model that ignores the best available science.

Such action will allow the Commission time to consult with independent experts, such as researchers from USGS, the National Park Service in the Santa Monica Mountains National Recreation Area, and others, to provide it accurate, scientific information to make an informed decision.

Sincerely,

Richard Halsey  
Director  
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Ara Marderosian  
Executive Director  
[Sequoia ForestKeeper](#)

Michael Wellborn  
President  
[Friends of Harbors, Beaches, and Parks](#)

**From:** Judy Villablanca <judygrobv@gmail.com>

**Sent:** Wednesday, July 7, 2021 4:33 PM

**To:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>; NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>

**Subject:** Opposition to San Mateo County and Santa Cruz County Public Works Plans, July 2021 - Thursday. Agenda item: Th16a and Th19a Inbox

**Dear California Coastal Commission,**

Dear California Coastal Commission,

**I am writing to express my opposition to the San Mateo County and Santa Cruz County Public Works Plans, July 2021 Thursday agenda items Th16a and Th19a.** Please either deny or postpone approving both of these proposed Public Works Plans (PWP) since both will seriously harm environmentally sensitive coastal habitats such as California sage scrub and maritime chaparral.

The justification for both PWP is based primarily on the scientifically incorrect claim: *“For the last century, fire suppression, and more recently, climate change, have resulted in unhealthy forests that set the stage for disease, pest infestations, and larger and more intense fires than would naturally occur in the absence of human interventions. Fire suppression has resulted in many forests characterized by dense overgrowth including too many trees and an unnaturally thick and impenetrable understory.”*

The California coastal zone habitat is composed mainly of chaparral and coastal sage scrub. The CalVTP plan was designed with a focus on mixed-conifer forest ecosystems which does not apply to the coastal zone due to different risk factors for wildfires. Recent large destructive fires in the coastal zone would not have been prevented by native vegetation clearance or prescribed burns, since they were driven by hot dry weather (climate change) and wind. The devastating 2018 Woolsey fire jumped the 8 lanes of the 101 freeway due to embers driven by high winds. No fuel break or prescribed burn would have stopped the progress of this fire.

**The CalVTP is environmentally destructive and will not prevent fires or protect homes.** The reports claim that the CalVTP programmatic EIR *“...provides a comprehensive framework for implementing vegetation treatment projects through the adherence to Standard Project Requirements and Mitigation Measures that will result in the avoidance and minimization of adverse impacts to environmental resources.”* This statement is not true. Native vegetation clearance will lead to loss of critical habitat, in addition to the already extensive losses from wildfires in recent years and to more areas converting to non-native invasive plants that are more likely to burn. Clearance will not be successful in preventing or limiting fires and thus will only

increase habitat impacts. Native coastal habitat cannot be characterized merely as “fuel” but must be recognized for its important role in California’s biodiversity.

It has been well demonstrated that the optimal strategy for protecting human life and property is to harden structures and manage the habitat directly around structures (ie homes). The state should be encouraged to fund alternative programs that promote homes to be retrofitted with non-flammable materials (ie for roofs, decks) as well as ember proof vents, and to establish vegetation (including native plants) in the immediate vicinity around homes that is kept watered and trimmed of dead materials.

The mitigation measure SPR BIO-5 within the CalVTP also utilizes an impossibly ambiguous metric based on “habitat value,” a subjective measurement that will be determined by the “project proponent.” This presents a clear conflict of interest by delegating the determination of a key environmental impact of a project to a future, unknown entity. This definition would not prevent a project proponent from converting native shrubland to non-native grassland in order to “improve” the habitat value for deer. A programmatic EIR should establish a proper definition of type conversion based on research and California Environmental Quality Act (CEQA) guidelines.

I urge the Coastal Commission to act on these two proposed PWP’s based on your purpose to protect nature in the coastal zone. The coastal area and its incredible biodiversity already face major impacts from development, climate change, and pesticides/rodenticides. These two PWP’s will add another major negative impact on the coastal habitat and yet will not prevent the loss of homes from wildfires.

I urge the Commission to deny or postpone any decision on the proposed PWP’s of San Mateo and Santa Cruz Counties. Both are based on a failed Cal Fire model that ignores the best available science and is not applicable to the habitats in our coastal zone. This will allow the Commission time to consult with independent experts, such as researchers from USGS, the National Park Service in the Santa Monica Mountains National Recreation Area, and others, to provide accurate, scientific information to make an informed decision.

Thank you for your consideration of my comments.

Judy Villablanca  
Malibu Resident

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**From:** clarkemh@aol.com <clarkemh@aol.com>

**Sent:** Wednesday, July 7, 2021 4:21 PM

**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>

**Subject:** Public Comment, July 2021 Agenda item: Thursday 16a - San Mateo County PWP No. PWP-2-VTP-21-0002-2.

I urge you to deny certifying, or at least delay certifying, both the San Mateo (Th16a) and Santa Cruz (Th19a) Counties Forest Health and Fire Resilience Public Works Plans (PWP).

I am asking for this delay because both PWPs, if approved, will likely lead to significant environmental harm to native habitats along the coastal zone.

The Commission needs more time to hear from the scientific and environmental communities in order to properly assess the negative environmental impact of these PWPs and the incorrect assumptions contained with the staff reports.

I greatly respect the staff's work on these items, but there are some fundamental errors in the reports that may have influenced the decision-making process. These errors are not of the staff's making, but rather erroneous assumptions and scientifically unsound statements that likely originated from various state departments, especially Cal Fire, concerning fire ecology and wildfire safety.

Specifically, both reports for the PWPs are based on the following errors:

1. Mischaracterization of coastal zone habitats.
2. Mischaracterization of fire suppression impacts.
3. Assuming the CalVTP will provide adequate mitigation measures to prevent the destruction of native habitat.
4. Assuming that clearance of habitat is the answer to community fire safety.  
Please deny or delay certifying these Public Works Plans.

Thank you for your consideration of my request..

Sincerely,

Mary H. Clarke

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**From:** Torrey Hosey <hosey002@cougars.csusm.edu>

**Sent:** Wednesday, July 7, 2021 4:09 PM

**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>

**Cc:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

**Subject:** Regarding Public Works Plans

Dear California Coastal Commission,

Please either deny or postpone approving the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a. Both plans will seriously compromise environmentally sensitive habitats such as California sage scrub and maritime chaparral. The Commission staff reports relating to these plans also have significant errors.

Best,

Torrey H

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**From:** Georgia Goldfarb, MD <georgia.goldfarb@healthequality.net>  
**Sent:** Wednesday, July 7, 2021 3:51 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>  
**Subject:** Opposed to San Mateo County and Santa Cruz County Public Works Plans, July 2021 - Thursday.  
Agenda item: Th16a and Th19a

Dear California Coastal Commission,

Please either deny or postpone approving the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a. Both plans will seriously compromise environmentally sensitive habitats such as California sage scrub and maritime chaparral. The Commission staff reports relating to these plans also have significant errors.

**We are asking for this delay because both PWP's, if approved, will likely lead to significant environmental harm to native habitats along the coastal zone.**

The Commission needs more time to hear from the scientific and environmental communities in order to properly assess the negative environmental impacts of these PWP's and the incorrect assumptions contained within the associated staff reports.

Although the staff has worked hard on these items, conclusions may be based on erroneous information regarding fire ecology and wildfire safety, possibly given to staff by other departments, such as CalFire.

Fire suppression effects are not relevant in chaparral, where the natural cycle of fire may be over 100 years, longer than the advent of fire suppression.

In addition, there is no evidence that "clearance" by whatever mechanism is protective against wildfire for homes. The first 5 feet from the structure are most critical, with the next approximately 70 feet being second. Trimming of dead materials and periodic watering has, however, been shown to reduce flammability of plants. House hardening measures are **critical**.

Invasive plants, particularly grasses have also been implicated in the spread of wildfire. All efforts, short of pesticides, should be taken to remove these without damage to native habitat.

Wildland habitat is already being damaged by drought and climate change. Our state government should not be further contributing to its destruction. These measures as currently crafted will do just that in our chaparral and coastal sage scrub.

Please, delay these items so that more appropriate and effective measures can be taken to protect our homes and wildland habitat.

Thank you,

Georgia Goldfarb  
Malibu Monarch Project



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**From:** Janice Cecil <jancecil8@gmail.com>  
**Sent:** Wednesday, July 7, 2021 3:34 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** CentralCoast@coast.ca.gov  
**Subject:** URGENT - Coastal Commission stop VTP on Coast

Dear California Coastal Commission,

Please either deny or postpone approving the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a. Both plans will seriously compromise environmentally sensitive and important habitats such as California sage scrub, maritime chaparral, and coastal forests. These fuel reduction plans will not reduce fire risk to human communities, which requires making the structures themselves less flammable and vegetation management directly around the structures. We must also reduce greenhouse gases, which cause climate change with hotter weather and stronger winds – and hence more frequent fires.

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**From:** Catherine Moody <mehaimoody@gmail.com>  
**Sent:** Wednesday, July 7, 2021 3:09 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>  
**Subject:** Fuel Reduction Plans San Mateo and Santa Cruz County

Re: Agenda Items Th16a and Th19a

I am writing to you as a local concerned about our local chaparral habitat and the birds and mammals that live there. Please deny certifying both the San Mateo County (Th16a) and Santa Cruz County (Th19a) Forest Health and Fire Resilience Public Works Plans (PWP).

Clearance of the habitat is not the answer to community fire safety. Clearance of native habitats will cause a loss to species and ultimately a loss for all of us. Chaparral is a native habitat necessary for many species of animals. Using weed killer in particular adds dangerous toxins to the environment and this affects us all. The solution is in clearing scrub from around people's homes and hardening their homes against fire. We have particularly seen the decline of native birds in areas exposed to weed killers and the razing of chaparral.

I hope that you will not go forward with this ill-advised plan. It will not protect us against fire, but it will harm our environment.

Sincerely,

Catherine Moody

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-----Original Message-----

From: Jean Marquardt <jeanmarquardt@gmail.com>

Sent: Wednesday, July 7, 2021 2:45 PM

To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>

Cc: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

Subject: San Mateo and Santa Cruz public plans agenda item TH16A & TH19A

Please consider delaying and doing more research on these two public plans. It is clear that there is more to this issue than what has been presented to you. I agree with the California chaparral Institute comments two require more thought and information on this agenda item. thank you, Jean Marquardt

Sent from my iPhone

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**From:** Roberta Lyons <roberta.lyons@att.net>

**Sent:** Wednesday, July 7, 2021 2:41 PM

**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>

**Cc:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

**Subject:** Opposition to Public Works Plans

July 7, 2021

**Re: Opposition to San Mateo County and Santa Cruz County Forest Health and Fire Resilience Public Works Plans (PWP)**

North Central Coast Coastal Commission

Central Coast Coastal Commission

Dear California Coastal Commission,

Please either deny or postpone approving the San Mateo and Santa Cruz county Public Works Plans agenda item Th 16a and Th 19a. Both plans will seriously compromise environmentally sensitive habitats such as California sage scrub and maritime chaparral. The commission staff reports relating to these plans have significant errors.

Sincerely,

Roberta Lyons, President

Redbud Audubon Society

Lake County, CA

---

**From:** Ellen Pierce <ellene000@yahoo.com>  
**Sent:** Wednesday, July 7, 2021 2:40 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>  
**Subject:** Cal fire

Dear California Coastal Commission,

Please either deny or postpone approving the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a. Both plans will seriously compromise environmentally sensitive habitats such as California sage scrub and maritime chaparral. The Commission staff reports relating to these plans also have significant errors.

Sincerely,  
Ellen

Sent from my iPhone

---

**From:** Linda O'Brien <al2bize@gmail.com>  
**Sent:** Wednesday, July 7, 2021 2:24 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>  
**Subject:** Opposed to San Mateo County and Santa Cruz County Public Works Plans, July 2021 – Thursday Agenda Items Th16a, Th19a

Dear California Coastal Commission,

Please either deny or postpone approving the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a. Both plans will seriously compromise environmentally sensitive habitats such as California sage scrub and maritime chaparral. The Commission staff reports relating to these plans also have significant errors.

**I am asking you to delay because both PWP's, if approved, will likely lead to significant environmental harm to native habitats along the coastal zone.**

The Commission needs more time to hear from the scientific and environmental communities in order to properly assess the negative environmental impacts of these PWP's and the incorrect assumptions contained within the associated staff reports.

We greatly respect the staff's work on these items, but there are some fundamental errors in the reports that may have influenced the decision-making process. These errors are not of the staff's

making, but rather erroneous assumptions and scientifically unsound statements that likely originated from various state departments, especially Cal Fire, concerning fire ecology and wildfire safety.

Specifically, both reports for the PWP are based on the following errors:

1. Mischaracterization of coastal zone habitats.
2. Mischaracterization of fire suppression impacts.
3. Assuming the CalVTP will provide adequate mitigation measures to prevent the destruction of native habitat.
4. Assuming that clearance of habitat is the answer to community fire safety.

Thank you,  
Linda O'Brien  
Concerned Citizen

---

**From:** Kathlene A. Henry-Gorman <khenrygo@calpoly.edu>  
**Sent:** Wednesday, July 7, 2021 2:05 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>  
**Subject:** Opposed to San Mateo County and Santa Cruz County Public Works Plans, July 2021 – Thursday Agenda Items Th16a, Th19a

Dear California Coastal Commission,

Please either deny or postpone approving the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a. Both plans will seriously compromise environmentally sensitive habitats such as California sage scrub and maritime chaparral. The Commission staff reports relating to these plans also have significant errors.

The Commission needs more time to hear from the scientific and environmental communities to properly assess the negative environmental impacts of these PWPs and the incorrect assumptions contained within the associated staff reports.

I greatly respect the staff's work on these items, but there are some fundamental errors in the reports that may have influenced the decision-making process. These errors are not of the staff's making, but rather erroneous assumptions and scientifically unsound statements that likely originated from various state departments, especially Cal Fire, concerning fire ecology and wildfire.

Please allow the Commission time to consult with independent experts, such as researchers from USGS, the National Park Service in the Santa Monica Mountains National Recreation Area, and others, to provide it accurate, scientific information to make an informed decision.

Thank you for your consideration on this very important matter,

Kathlene Henry-Gorman  
2420 Ross Rd.  
Cambria, CA 93428

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-----Original Message-----

From: Att <kcrowd@att.net>

Sent: Wednesday, July 7, 2021 2:17 PM

To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>

Cc: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

Subject: Fwd: Th16a, th19a

>

> Dear Commission Members,

> Please deny or postpone approving San Mateo and Santa Cruz County Public Works Plan in agenda items Th16a and Th19a. Both seriously compromise sensitive habitats such as CA sage and maritime chaparral. Both items have errors and require science-based information to guide you.

> Sincerely,

> Rosemary Kelley

> San Diego, CA

---

**From:** Joseph Migliore <jayseem@dc.rr.com>

**Sent:** Wednesday, July 7, 2021 1:35 PM

**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>

**Cc:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

**Subject:** Re: Opposed to San Mateo County and Santa Cruz County Public Works Plans, July 2021 – Thursday Agenda Items Th16a, Th19a

Dear California Coastal Commission,

Please either deny or postpone approving the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a. Both plans will seriously compromise environmentally sensitive habitats such as California sage scrub and maritime chaparral. The Commission staff reports relating to these plans also have significant errors.

Respectfully, Joseph Migliore

Member: California Chaparral Institute

69655 Valle de Costa  
Cathedral City CA 92234

[Jayseem@dc.rr.com](mailto:Jayseem@dc.rr.com)

---

-----Original Message-----

From: Kathleen Cook <kccweaves@yahoo.com>

Sent: Wednesday, July 7, 2021 1:32 PM

To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>

Cc: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

Subject: Opposed to San Mateo County and Santa Cruz County Public Works Plans, July 2021 – Thursday Agenda Items Th16a, Th19a

Dear California Coastal Commission,

Please either deny or postpone approving the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a. Both plans will seriously compromise environmentally sensitive habitats such as California sage scrub and maritime chaparral. The Commission staff reports relating to these plans also have significant errors.

Bottom line:

The solution to reducing fire risk to human communities is to make those communities fire safe themselves by proper planning, retrofits, and vegetation management directly around vulnerable structures, not by converting biodiverse wildlands into unnatural, park-like landscapes.

 kathleen cook

619-992-9018

kccweaves.blogspot.com

life is full...enjoy!

Love to all who came before us,  
Love to all who now surround us,  
Love to all who journey beyond us,  
Love and gratitude to all.

---

**From:** Margaret Meyncke <m.meyncke@gmail.com>

**Sent:** Wednesday, July 7, 2021 1:28 PM

**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>; SoCal Broads <socalbroads@gmail.com>

**Cc:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

**Subject:** Deny or Postpone!

Dear California Coastal Commission,

Please either **deny or postpone** approving the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a.

Both plans will seriously compromise environmentally sensitive habitats such as California sage scrub and maritime chaparral. The Commission staff reports relating to these plans also have significant errors

Sincerely,

--

Margaret Meyncke  
[m.meyncke@gmail.com](mailto:m.meyncke@gmail.com)  
951-551-6231

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**From:** Barbara Kelsey <barbara.kelsey@sierraclub.org>  
**Sent:** Wednesday, July 7, 2021 1:14 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>; Hudson, Steve@Coastal <Steve.Hudson@coastal.ca.gov>; Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; Engel, Jonna@Coastal <Jonna.Engel@coastal.ca.gov>; Dettmer, Alison@Coastal <Alison.Dettmer@coastal.ca.gov>  
**Cc:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>; Karen Maki <karen@karenmaki.com>; James Eggers <james.eggers@sierraclub.org>; Gladwyn d'Souza <godsouza@mac.com>; Mike Ferreira <MichaelJFerreira@gmail.com>  
**Subject:** Loma Prieta Chapter Sierra Club comment letter re: Opposed to San Mateo County Public Works Plans, July 2021–Thursday Agenda Items Th16a

July 7, 2021  
California Coastal Commission  
455 Market St., Suite 300  
San Francisco, CA 94105

Dear Commissioners and Staff,

The Loma Prieta Chapter of the Sierra Club represents approximately 20,000 members and supporters in San Mateo, Santa Clara, and San Benito Counties. We urge you to deny certifying, or at least delay certifying the San Mateo County (Th16a) Forest Health and Fire Resilience Public Work Plan (PWP). The Th16a PWP would likely lead to significant environmental harm to native habitat along San Mateo County's coast. Please see our full comment letter attached.

Yours truly,  
Karen Maki  
Forest Protection Committee Chair  
Loma Prieta Chapter Sierra Club

Cc: James Eggers  
Executive Director  
Loma Prieta Chapter Sierra Club

Gladwyn d'Souza  
Conservation Committee Chair  
Loma Prieta Chapter Sierra Club

Mike Ferreira  
Chapter Political Chair  
Loma Prieta Chapter Sierra Club

Sent by:  
Barbara Kelsey  
she/her/hers  
Chapter Coordinator  
Sierra Club, Loma Prieta Chapter  
3921 E. Bayshore Rd, Suite 204  
Palo Alto, CA 94303  
[barbara.kelsey@sierraclub.org](mailto:barbara.kelsey@sierraclub.org)

Please note that our Chapter office in Palo Alto is likely closed until July 19, 2021; so email is the best way to contact us. Thank you.

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**From:** Deborah Knight <[rosecanyon@san.rr.com](mailto:rosecanyon@san.rr.com)>  
**Sent:** Wednesday, July 7, 2021 1:04 PM  
**To:** [NorthCentralCoast@Coastal](mailto:NorthCentralCoast@Coastal) <[NorthCentralCoast@coastal.ca.gov](mailto:NorthCentralCoast@coastal.ca.gov)>  
**Subject:** Public Comment on July 2021 Agenda Item Thursday 16a - San Mateo County PWP No. PWP-2-VTP-21-0002-2

Friends of Rose Canyon submits the following comments:

We urge you to deny certifying, or at least delay certifying, both the San Mateo (Th16a) and Santa Cruz (Th19a) Counties Forest Health and Fire Resilience Public Works Plans (PWP).

We are asking for this delay because both PWPs, if approved, will likely lead to significant environmental harm to native habitats along the coastal zone.

The Commission needs more time to hear from the scientific and environmental communities in order to properly assess the negative environmental impact of these PWPs and the incorrect assumptions contained with the staff reports.

We greatly respect the staff's work on these items, but there are some fundamental errors in the reports that may have influenced the decision-making process. These errors are not of the staff's making, but rather erroneous assumptions and scientifically unsound statements that likely originated from various state departments, especially Cal Fire, concerning fire ecology and wildfire safety.

Specifically, both reports for the PWPs are based on the following errors:

1. Mischaracterization of coastal zone habitats.
2. Mischaracterization of fire suppression impacts.



3. Assuming the CalVTP will provide adequate mitigation measures to prevent the destruction of native habitat.

4. Assuming that clearance of habitat is the answer to community fire safety.

Deborah Knight  
Executive Director  
Friends of Rose Canyon  
858-525-1489 - cell  
[rosecanyon@san.rr.com](mailto:rosecanyon@san.rr.com)

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**From:** jennifernormoyle123@gmail.com <jennifernormoyle123@gmail.com>  
**Sent:** Wednesday, July 7, 2021 12:33 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>  
**Subject:** San Mateo, Santa Cruz Public Works Plans, agenda items TH16a and Th19a

Dear California Coastal Commission,

Please either deny or, at the very least, postpone approval of the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a. Both plans will seriously harm environmentally sensitive and important habitats that include species such as California sage scrub, maritime chaparral, and coastal forests. Independent peer-reviewed scientific data confirms that fuel reduction does not significantly reduce fire risk to human communities.

Instead, what is needed is retrofitting of community structures themselves to make them less flammable and less vulnerable to the effects of wind-driven embers. In addition, vegetation management needs to be concentrated directly around structures. And, of course, we must reduce the greenhouse gases that have caused climate change, resulting in hotter weather and stronger winds – and, hence, more frequent wind-driven destructive fires.

Sincerely,

Jennifer Normoyle  
Hillsborough, California

Sent from [Mail](#) for Windows 10

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**From:** Cassy Aoyagi <cassy@formlainc.com>  
**Sent:** Wednesday, July 7, 2021 11:47 AM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>  
**Subject:** Deny or postpone approving the San Mateo and Santa Cruz County Public Works Plans

Dear California Coastal Commission,

Please either deny or postpone approving the San Mateo and Santa Cruz County Public

Works Plans in agenda items Th16a and Th19a. Both plans will seriously compromise environmentally sensitive habitats such as California sage scrub and maritime chaparral. The Commission staff reports relating to these plans also have significant errors.

**Cassy Aoyagi**  
**President**  
**FormLA Landscaping, Inc**  
[www.formlainc.com](http://www.formlainc.com)  
**Board Member**  
**United States Green Building Council Los Angeles**  
[USGBC-LA](#)  
**SITES Accredited Professional**  
**Past president,**

[Theodore Payne Foundation](#)

**PO BOX 441**  
**Tujunga, Ca. 91043**  
[818-353-7030](tel:818-353-7030)  
[310-979-9002](tel:310-979-9002)  
**Like us on FB: [FormLAFacebook](#)**  
**Follow us on twitter: [@formlainc](#)**

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-----Original Message-----

From: Paul Hormick <phbb@pacbell.net>  
Sent: Wednesday, July 7, 2021 11:36 AM  
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
Cc: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>  
Subject: Clearing Chaparral and Coastal Sage Scrub

Dear California Coastal Commission:

Please deny or postpone the approval of the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a.

Because the Commission staff reports relating to these plans have significant errors, both plans will seriously compromise environmentally sensitive habitats such as coastal sage scrub and maritime chaparral.

Sincerely,

Paul Hormick

---

**From:** Esther Page <estherspage0@gmail.com>  
**Sent:** Wednesday, July 7, 2021 10:59 AM

**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>  
**Subject:** San Mateo and Santa Cruz County Public Works Plans

Dear California Coastal Commission,

Please either deny or postpone approving the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a. Both plans will seriously compromise environmentally sensitive and important habitats such as California sage scrub, maritime chaparral, and coastal forests. These fuel reduction plans will not reduce fire risk to human communities, which requires making the structures themselves less flammable and vegetation management directly around the structures. We must also reduce greenhouse gases, which cause climate change with hotter weather and stronger winds – and hence more frequent fires.

Thank you,

Esther Page

---

**From:** F B <chendri887@yahoo.com>  
**Sent:** Wednesday, July 7, 2021 10:36 AM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>  
**Subject:** Please deny approving the San Mateo/Santa Cruz Public Works Plans sends items Th16a, Th19a

Dear California Coastal Commission,

Please either deny or postpone approving the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a. Both plans will seriously compromise environmentally sensitive habitats such as California sage scrub and maritime chaparral. The Commission staff reports relating to these plans also have significant errors.

Please consider that these habitats do not return once destroyed and are often replaced by more flammable and destructive invasive species.

Sincerely,  
Chris Hendrickson  
Viva California Chapparal!

---

**From:** Pamela Smyth <Plousmyth@aol.com>  
**Sent:** Wednesday, July 7, 2021 10:14 AM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>; Plousmyth@aol.com  
**Subject:** Clear-cutting Habitat Along California Coastal Regions

Dear North Central Coastal Commission and California Coastal Commission,

The California Chaparral Institute writes to both of you: "Please either deny or postpone approving the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a. Both plans will seriously compromise environmentally sensitive habitats such as California sage scrub and maritime chaparral. The Commission staff reports relating to these plans also have significant errors."

Having been a resident of the city of Santa Barbara and lived within that county as one who has traveled our coast for years, to see this done along the northern California coast line is shocking to me and not justifiable when there are better ways to protect the natural chaparral from wildfires. As you are well aware, Jack and Laura Dangermond from Redlands generously and lovingly made sure that a large area of our California coast would be protected from development; that also suggests to me other intrusions on the natural environment such as the disturbance or destruction of trees, shrubs, and native chaparral, along with wildlife. I'm horrified that this kind of devastation would even be considered viable. As I have said to councils and planning commissions countless times regarding loss of the natural or planted environments in this area and others, there is no checkbook, no spreadsheet, no ledger, and no glossy marketing or other type of presentation that is big enough or grand enough to replace what you can so easily destroy.

Please--just walk there, breathe in the ocean air, watch the squirrels, the Blue jays, the Pelicans, the Seagulls, the Blue herons, the Sand Pipers, even the sand crabs, and look for the harbor seals bobbing off shore to suddenly appear and invite you to play in their habitat...it is theirs, not ours to tamper with, re-arrange, or to destroy but to safeguard and protect--that is your duty, obligation, and your promise.

Yours sincerely,

Pamela Smyth

Redlands, CA

---

-----Original Message-----

From: Winter Dellenbach <wintergery@earthlink.net>

Sent: Wednesday, July 7, 2021 9:39 AM

To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>

Cc: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

Subject: Deny approval - San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a

Dear California Coastal Commission -

The use of herbicide is appalling given what is now known of consequences to animals and humans, and the proposed burns are irrational for the area of contemplated use.

Please do not approve such scientifically unsupported actions, and as in the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a.

Thank you -

Winter Dellenbach  
Gerry Masteller  
Palo Alto, CA

---

-----Original Message-----

From: B Dass <bndass@yahoo.com>  
Sent: Wednesday, July 7, 2021 8:33 AM  
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
Cc: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>  
Subject: San Mateo and Santa Cruz County Public Works Plans

Dear California Coastal Commission,

Please either deny or postpone approving the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a. Both plans will seriously compromise environmentally sensitive and important habitats such as California sage scrub, maritime chaparral, and coastal forests. These fuel reduction plans will not reduce fire risk to human communities, which requires making the structures themselves less flammable and vegetation management directly around the structures. We must also reduce greenhouse gases, which cause climate change with hotter weather and stronger winds – and hence more frequent fires.

Thank you.

Jorge De Cecco  
Ukiah, CA

---

-----Original Message-----

From: Katie Titi <katie.titi@gmail.com>  
Sent: Tuesday, July 6, 2021 10:29 PM  
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
Cc: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>  
Subject: San Mateo and Santa Cruz County Public Works Plans

Dear California Coastal Commission,

Please either deny or postpone approving the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a. Both plans will seriously compromise environmentally sensitive habitats such as California sage scrub and maritime chaparral. The Commission staff reports relating to these plans also have significant errors.

Thank you,  
Katie Titi

---

**From:** Mike Gugerty <mike@mkireps.com>  
**Sent:** Tuesday, July 6, 2021 9:44 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>  
**Subject:** San Mateo and Santa Cruz County Public Works Plans

Dear California Coastal Commission,

Please either deny or postpone approving the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a. Both plans will seriously compromise environmentally sensitive habitats such as California sage scrub and maritime chaparral. The Commission staff reports relating to these plans also have significant errors.

Regards,

Mike Gugerty

Matzinger-Keegan Inc.  
2151 Michelson Dr.  
Suite 238  
Irvine, Ca 92612  
Office: 949-852-1006  
Cell: 818-516-9364  
[mike@mkireps.com](mailto:mike@mkireps.com)

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**From:** Roy West <rwest@monocot.com>  
**Sent:** Tuesday, July 6, 2021 9:24 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>  
**Subject:** Please make science-based decisions about coastal chaparral

Dear California Coastal Commission,

Please either deny or postpone approving the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a. Both plans will seriously compromise environmentally sensitive habitats such as California sage scrub and maritime chaparral. The Commission staff reports relating to these plans also have significant errors.

Sincerely,

Roy West  
657 Creston Rd, Berkeley, CA 94708

---

-----Original Message-----

From: Pam Toner <a2toner@me.com>  
Sent: Tuesday, July 6, 2021 7:29 PM  
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
Cc: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>  
Subject: Please Deny Th16a and Th19a

Dear California Coastal Commission,

Please do not approve the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a. These plans both threaten California sage scrub and maritime chaparral, which are environmentally sensitive habitats. There are also some significant errors in the Commission staff reports relating to these plans.

Thank you,

Pam Toner  
Orcutt, CA

---

**From:** Rosalind Helfand <rozhelfand@gmail.com>  
**Sent:** Tuesday, July 6, 2021 7:26 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>  
**Subject:** Agenda Items Th16a and Th19a -- Concern about the San Mateo & Santa Cruz County Public Work Plans

Dear California Coastal Commission,

Please either deny or postpone approving the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a. Both plans will seriously compromise environmentally sensitive habitats such as California sage scrub and maritime chaparral. The Commission staff reports relating to these plans also have significant errors.

Thank you,

Rosalind Helfand  
Environmental Policy Advisor  
PAJE Consulting

1956 N Beachwood Dr, Apt 8

Los Angeles, CA 90068

310-869-5749

---

**From:** Dylan Neubauer <dneubauer1111@gmail.com>  
**Sent:** Tuesday, July 6, 2021 7:19 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>; CentralCoast@Coastal <CentralCoast@coastal.ca.gov>  
**Subject:** Agenda items Th16a and Th19a

To the California Coastal Commission:

Please either deny or postpone approving the San Mateo and Santa Cruz County Public Works Plans in Agenda Items Th16a and Th19a. Both plans will seriously compromise environmentally sensitive habitats such as Northern Coastal Scrub and Maritime Chaparral, a globally and state rare sensitive plant community [California Department of Fish and Wildlife 2021].

The Commission staff reports relating to these plans have significant errors, and these need to be rectified.

Best regards,  
Dylan M. Neubauer  
Botanical Consultant

---

**From:** Lisa Bellora <ornamentalgardensbylisa@gmail.com>  
**Sent:** Tuesday, July 6, 2021 7:08 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>  
**Subject:**

Dear California Coastal Commission,

Please either deny or postpone approving the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a. Both plans will seriously compromise environmentally sensitive habitats such as California sage scrub and maritime chaparral. The Commission staff reports relating to these plans also have significant errors. I would highly encourage the Commission to allow experts in Environmental Science, specifically those who study these habitats, to be heard.

Thank you,  
Lisa

--

Lisa Bellora  
760-685-2023

email: [ornamentalgardensbylisa@gmail.com](mailto:ornamentalgardensbylisa@gmail.com)  
website: [www.ornamentalgardens.net](http://www.ornamentalgardens.net)



[HOUZZ](#)

[BBB A+ Accredited](#)

[G3](#) (Green Gardens Group Professional)

[APLD](#) (Association of Professional Landscape Designers, Secretary and Past President- San Diego District)

---

**From:** Masau'u <climbingdiamond@aol.com>

**Sent:** Tuesday, July 6, 2021 6:50 PM

**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>

**Cc:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

**Subject:** San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a.

Dear California Coastal Commission,

Please either deny or postpone approving the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a. Both plans will seriously compromise environmentally sensitive habitats such as California sage scrub and maritime chaparral. The Commission staff reports relating to these plans also have significant errors.

This is not the way to manage our coastal forest chaparral'.

Sincerely, Bryan Wold

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-----Original Message-----

From: Carol Selter <cselter@cruzio.com>

Sent: Tuesday, July 6, 2021 6:46 PM

To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>

Cc: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

Subject: Santa Cruz and San Mateo Counties plan

Dear California Coastal Commission,

Please either deny or postpone approving the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a. Both plans will seriously compromise environmentally sensitive habitats such as California sage scrub and maritime chaparral. The Commission staff reports relating to these plans also have significant errors.

These plant communities—particularly the maritime chaparral—suffered serious damage in last year's CZU Lightning Complex Fire. It is critical that remaining areas be protected. I urge you to err on the side of caution and do not approve the current plan by Public Works. I know these areas personally and am deeply concerned that they receive the best scientific evaluation before any more disturbance is approved. Thank you.

Sincerely,

Carol Selter  
Santa Cruz Co.

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**From:** Dan Silver <dsilverla@me.com>

**Sent:** Tuesday, July 6, 2021 6:41 PM

**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>

**Subject:** Public Comment on July 2021 Agenda Item Thursday 16a - San Mateo County PWP No. PWP-2-VTP-21-0002-2.

Honorable Chair and Commission Members:

These comments are offered by Endangered Habitats League, a Southern California conservation group dedicated to ecosystem protection, sustainable land use, and collaborative conflict resolution.

It is critical that you delay this item pending consultation with outside expert fire ecologists. This is essential due diligence to get past the CalFire “echo chamber.”

I am very familiar with the VPT and have reviewed the proposed Coastal Vegetation Treatment Standards (Coastal VTS). However, the latter do not fix the severe defects of the *scientifically unsound* CalFire VTP. Indeed, the VTP is the wrong foundation upon which to build a coastal program. For example, the massive landscape level treatments call for by the VTP, do not, at least for shrublands, protect human communities from wind-driven fires, which are the cause of the overwhelmingly amount of loss of life and property from California wildfires. Even CalFire admits this, but nevertheless insists on wasting taxpayer money much better spent on home hardening, evacuation planning, ignition control, etc.

I will limit specific comments to shrublands – chaparral and coastal sage scrub.

The Coastal VTS makes the same basic error as the VTP. It does not effectively differentiate between shrublands and conifer forests, but overlaps and conflates its directives. The Coastal VTS calls for a “mosaic” of age classes which is a long-discredited notion for shrublands. The Coastal VTS does not recognize that shrublands are burning so frequently due to human fire starts and climate change that further treatments create unacceptable risk for type conversion to flammable weeds. It does not recognize that there is no justification for greater than 100 ft of defensible space.

Your Commission should modify the Coastal VTS to specify the *exact circumstances* when treatment *are* justified in shrublands. These are, solely, 1) removal of flammable non-native, invasive species and restoration of native species in damaged or type-converted vegetation, 2) defensible space of 100-ft around structures and/or communities, 3) strategic fuel breaks within 1,000 feet of communities at risk, 4) ignition control along roadways, and 4) maintenance of fire roads that provide firefighting access to communities.

In conclusion, please take a pause for further consideration of 1) using the VTP at all, and 2) if you do so, making absolutely necessary improvements to the Coastal VTS. I would be happy to recommend consulting fire ecologists.

Yours truly,  
Dan Silver

Dan Silver, Executive Director  
Endangered Habitats League  
8424 Santa Monica Blvd., Suite A 592  
Los Angeles, CA 90069-4267

213-804-2750

[dsilverla@me.com](mailto:dsilverla@me.com)  
<https://ehleague.org>

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**From:** Don Chartrand <don@creeklands.org>  
**Sent:** Tuesday, July 6, 2021 6:37 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>  
**Subject:** CalFire plan

Dear California Coastal Commission,

Please either deny or postpone approving the San Mateo and Santa Cruz County Public Works Plans in agenda items Th16a and Th19a.

**Both plans will seriously compromise environmentally sensitive habitats such as California sage scrub and maritime chaparral.**

The Commission staff reports relating to these plans also have significant errors.

Thank you for your consideration,

**Don Chartrand**  
Executive Director  
[Creek Lands Conservation](http://CreekLandsConservation.org)  
Mobile: 805-294-2575  
[don@creeklands.org](mailto:don@creeklands.org)

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**From:** Pam Nelson <pamela05n@yahoo.com>  
**Sent:** Tuesday, July 6, 2021 12:51 PM  
**To:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on July 2021 Agenda Item Thursday 19a - Santa Cruz County PWP No. PWP-3-VTP-21-0003-1

Commissioners and Staff,

I am opposed to the the Work order proposed in Santa Cruz's coastal habitat. As a Sierra Club leader and activist in S. California, the importance of chaparral and coastal habitats has made a big impression on me. The treatment or management of these biomes are just as unique as they are. Our home is adjacent to chaparral. We know that leaving the chaparral alone and taking responsibility for our home is the safest method we can have for wildfire protection.

I appreciate the need and concern about wildfires, but management must be carefully suited to the habitat and site location. We will end up destroying the ecology that

humans depend on if we ignore the differences and the needs of the distinctly different habitats.

More studies are needed to find how and if this type of work should proceed.

Please deny this proposal.

Thank you,  
Pam Nelson

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**From:** Susan Liebes <sujackso@hotmail.com>  
**Sent:** Tuesday, July 06, 2021 11:46 AM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on July 2021 Agenda Item Thursday 16a - San Mateo County PWP No. PWP-2-VTP-21-0002-2.

I am writing to urge you to deny certifying, or at least delay certifying, both the San Mateo (Th16a) and Santa Cruz (Th19a) Counties Forest Health and Fire Resilience Public Works Plans (PWP).

We are asking for this delay because both PWPs, if approved, will likely lead to significant environmental harm to native habitats along the coastal zone.

The Commission needs more time to hear from the scientific and environmental communities in order to properly assess the negative environmental impact of these PWPs and the incorrect assumptions contained with the staff reports.

We greatly respect the staff's work on these items, but there are some fundamental errors in the reports that may have influenced the decision-making process. These errors are not of the staff's making, but rather erroneous assumptions and scientifically unsound statements that likely originated from various state departments, especially Cal Fire, concerning fire ecology and wildfire safety.

Specifically, both reports for the PWPs are based on the following errors:

1. Mischaracterization of coastal zone habitats.
2. Mischaracterization of fire suppression impacts.
3. Assuming the CalVTP will provide adequate mitigation measures to prevent the destruction of native habitat.
4. Assuming that clearance of habitat is the answer to community fire safety.

Thanks,  
*Susan Liebes*

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**From:** Livia Beaudin <livia@cerf.org>  
**Sent:** Tuesday, July 06, 2021 10:24 AM

**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>

**Subject:** Public Comment on July 2021 Agenda Item Thursday 16a - San Mateo County PWP No. PWP-2-VTP-21-0002-2.

Please accept the following comments on behalf of Coastal Environmental Rights Foundation (CERF). We urge you to deny certifying, or at least delay certifying, both the San Mateo (Th16a) and Santa Cruz (Th19a) Counties Forest Health and Fire Resilience Public Works Plans (PWP).

Delay is warranted because both PWPs, if approved, will likely lead to significant environmental harm to native habitats along the coastal zone. The Commission needs more time to hear from the scientific and environmental communities in order to properly assess the negative environmental impact of these PWPs and the incorrect assumptions contained with the staff reports.

We greatly respect the staff's work on these items, but there are some fundamental errors in the reports that may have influenced the decision-making process. These errors are not of the staff's making, but rather erroneous assumptions and scientifically unsound statements that likely originated from various state departments, especially Cal Fire, concerning fire ecology and wildfire safety.

Specifically, both reports for the PWPs are based on the following errors:

1. Mischaracterization of coastal zone habitats.
2. Mischaracterization of fire suppression impacts.
3. Assuming the CalVTP will provide adequate mitigation measures to prevent the destruction of native habitat.
4. Assuming that clearance of habitat is the answer to community fire safety.

Thank you in advance for your consideration of our comments.

Livia Borak Beaudin

Legal Director

Coastal Environmental Rights Foundation



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**From:** nature <nature@californiachaparral.org>

**Sent:** Monday, July 5, 2021 3:10 PM

**To:** Hudson, Steve@Coastal <Steve.Hudson@coastal.ca.gov>; Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; Engel, Jonna@Coastal <Jonna.Engel@coastal.ca.gov>; Dettmer, Alison@Coastal <Alison.Dettmer@coastal.ca.gov>; NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>; CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

**Cc:** Padilla, Stephen@Coastal <Stephen.Padilla@coastal.ca.gov>; Brownsey, Donne@Coastal

<donne.brownsey@coastal.ca.gov>; Turnbull-Sanders, Effie@Coastal <effie.turnbull-sanders@coastal.ca.gov>; Aminzadeh, Sara@Coastal <sara.aminzadeh@coastal.ca.gov>; Hart, Caryl@Coastal <caryl.hart@coastal.ca.gov>; Wilson, Mike@Coastal <mike.wilson@coastal.ca.gov>; Rice, Katie@Coastal <katie.rice@coastal.ca.gov>; Escalante, Linda@Coastal <linda.escalante@coastal.ca.gov>; Harmon, Meagan@Coastal <meagan.harmon@coastal.ca.gov>; Uranga, Roberto@Coastal <roberto.uranga@coastal.ca.gov>; Groom, Carole@Coastal <carole.groom@coastal.ca.gov>; Dan Silver <dsilverla@me.com>; Ara Marderosian (Ara Marderosian) <ara@sequoiaforestkeeper.org>; Melanie Schlotterbeck <melanie@schlotterbeck.net>  
**Subject:** Public Comments on July 2021 Agenda Item Thursday 16a and 19a

Dear California Coastal Commission,

Please accept our attached comment letter on the San Mateo/Santa Cruz PWP, items Th16a and Th19a, July 2021.

We are urging you to deny certifying, or at least delay certifying, both the San Mateo (Th16a) and Santa Cruz (Th19a) Counties Forest Health and Fire Resilience Public Works Plans (PWP).

**We are asking for this delay because both PWPs, if approved, will likely lead to significant environmental harm to native habitats along the coastal zone.**

The Commission needs more time to hear from the scientific and environmental communities in order to properly assess the negative environmental impact of these PWPs and the incorrect assumptions contained with the staff reports.

Sincerely,

Richard W. Halsey  
Director

Dan Silver  
Endangered Habitats League

Ara Marderosian  
Sequoia ForestKeeper

Michael Wellborn  
Friends of Harbors, Beaches, and Parks

California Chaparral Institute  
[www.californiachaparral.org](http://www.californiachaparral.org)  
PO Box 545  
Escondido, CA 92033



**From:** john armstrong <armstrongj1@outlook.com>  
**Sent:** Sunday, July 4, 2021 8:47 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>; Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; Hudson, Steve@Coastal <Steve.Hudson@coastal.ca.gov>  
**Subject:** Constrain Cal Fire!

Cal Fire wants to inappropriately spray native and other chaparral species with herbicides for really just 2 reasons:

- The big bribery money coming from agrochem:

### Big agrochemical – the top 10 agrichemical companies in the world:

<u>Company</u>	<u>Annual revenue in billions for 2019</u>	
1 ChemChina (Chinese):	\$14.2	ChemChina/ChinaChem acquired (Swiss) Syngenta and (Israeli) Adama but it may not stick.
2 Syngenta AG (Swiss):	\$10.4	
3 Bayer / Crop Science (German):	\$8.16	Bayer owns Roundup (glyphosate) via Monsanto acquisition in 2018.
4 BASF SE (German):	\$6.76	Monsanto divests to BASF to underplay the soured name.
5 Dow Agro Sciences (US):	\$4.66	
6 FMC (US):	\$4.28	
7 Adama Ltd. (Israel):	\$3.88	
8 Nufarm Ltd.:	\$3.31	
9 Sumitomo Chemical Co., Ltd.:	\$3.14	
10 UPL Limited:	\$3.14	

- and in some cases, they really just don't know any better. But mostly, they really do know better, it's just that there's so much more money in committing CA taxpayer money to domestic and foreign agrochem CEOs.

They should be doing a tremendous amount more of prescribed burns, and not such destructive work on CA vegetation resource.

It's the same situation with their PFAS manufacturers in their "big show" slurry drops on wildfires.

I tell it like it is.

John Armstrong – Sierra Club Forestry Committee member; 22 years exp in USFS genetics; 11 years with CalEPA depts.

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**From:** Ara Marderosian <ara@sequoiaforestkeeper.org>  
**Sent:** Sunday, July 4, 2021 9:29 AM  
**To:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; Hudson, Steve@Coastal <Steve.Hudson@coastal.ca.gov>; NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** CalFire Vegetation Treatment Program and Th.16.a and 19.a

[NorthCentralCoast@coastal.ca.gov](mailto:NorthCentralCoast@coastal.ca.gov)  
[John.Ainsworth@coastal.ca.gov](mailto:John.Ainsworth@coastal.ca.gov)  
[Steve.Hudson@coastal.ca.gov](mailto:Steve.Hudson@coastal.ca.gov)

Dear Mr. Hudson and Mr. Ainsworth:

Thank you for the opportunity to respond to this issue on a holiday weekend.

Regarding items Th 16.a and 19.a before the Coastal Commission, we ask the Commission to delay action on these items in order for the scientific and environmental community to provide critical information. **We are asking for this delay because both items, if approved, will likely lead to significant environmental harm to native habitats along the coastal zone.**

Please give us more time to provide the necessary information to help the Commission continue to protect Nature in the face of powerful interests.

Respectfully submitted,

Mr. Ara Marderosian  
Sequoia ForestKeeper®  
P.O. Box 2134  
Kernville, CA 93238  
(760) 376-4434  
[www.sequoiaforestkeeper.org](http://www.sequoiaforestkeeper.org)  
[ara@sequoiaforestkeeper.org](mailto:ara@sequoiaforestkeeper.org)

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**From:** nature@californiachaparral.org <nature@californiachaparral.org>

**Sent:** Saturday, July 3, 2021 2:30 PM

**To:** Hudson, Steve@Coastal <Steve.Hudson@coastal.ca.gov>; 'David Grubb' <davidzgrubb@gmail.com>

**Cc:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; Engel, Jonna@Coastal <Jonna.Engel@coastal.ca.gov>; 'Richard Halsey' <rwh@californiachaparral.org>; Dettmer, Alison@Coastal <Alison.Dettmer@coastal.ca.gov>; Dan Silver 12/16 <dsilverla@me.com>; 'Bryant Baker' <bryant@californiachaparral.org>; 'Daniel Barad' <daniel.barad@sierraclub.org>; 'Travis Kemnitz' <kemnitz@sandiegoaudubon.org>; 'Tom Wheeler' <tom@wildcalifornia.org>; 'Brian Nowicki' <bnowicki@biologicaldiversity.org>; longcore@urbanwildlands.org; 'Nicholas Jensen' <njensen@cnps.org>; 'Ara Marderosian' <ara@sequoiaforestkeeper.org>

**Subject:** RE: CalFire Vegetation Treatment Program and Th.16.a and 19.a

Dear Mr. Hudson,

Thank you for responding so quickly to this issue, especially on a holiday weekend.

We are pulling together a comment letter today on these two items before the Coastal Commission and will hopefully send it along shortly.

At the very least, we will be asking the Commission to delay action on items Th 16.a and 19.a in order for the scientific and environmental community to provide critical information. **We are asking for this**



**delay because both items, if approved, will likely lead to significant environmental harm to native habitats along the coastal zone.**

We greatly respect the staff's work on these items, but there are some fundamental errors in the reports that may have influenced the decision making process. These errors are not of the staff's making, but rather erroneous assumptions and scientifically unsound statements that likely originated from various state departments, especially Cal Fire, concerning fire ecology and wildfire safety.

It is for these same reasons we are challenging Cal Fire's Vegetation Treatment Program (VTP) in court.

The two proposals in question are just the beginning of a massive effort to remove or alter natural habitats throughout California, with the coastal zone being especially vulnerable.

Outside of climate change, Cal Fire and the VTP present the most dire threats to native habitats throughout the state. Beyond the courts, the Commission provides one of our best hopes to check the unrestrained ambitions of the biomass industry, habitat clearance contractors, timber interests, and the Cal Fire bureaucracy.

The Coastal Commission has always provided the bright light of truth in a foggy sea of self-interest and bureaucratic bungling. This was my hope when I knocked on doors back in 1972 to help pass Proposition 20, which established the California Coastal Zone Conservation Act. Despite efforts to influence it, to weaken it, and to change its mission, the Commission has held true to its purpose – protecting Nature along the coastal zone and helping Californians access that Nature.

Please give us more time to provide the necessary information to help the Commission continue to protect Nature in the face of powerful interests.

Sincerely,

Richard W. Halsey  
Director

**California Chaparral Institute**

*... the voice of the Chaparral*

P.O. Box 545  
Escondido, CA 92033



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**From:** David Grubb <davidzgrubb@gmail.com>

**Sent:** Saturday, July 3, 2021 10:51 AM

**To:** Dettmer, Alison@Coastal <Alison.Dettmer@coastal.ca.gov>; Hudson, Steve@Coastal <Steve.Hudson@coastal.ca.gov>

**Cc:** Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; Engel, Jonna@Coastal <Jonna.Engel@coastal.ca.gov>; Richard Halsey <rwh@californiachaparral.org>  
**Subject:** CalFire Vegetation Treatment Program and Th.16.a and 19.a

Hi All,

As I suspected, and noted on the call, there is strong opposition to items Th 16.a and 19.a.

The Chaparral Institute is in litigation against CalFire over the VTP due to serious concerns about the science behind it and the severe environmental impacts.

See <https://californiachaparral.org/> and <https://californiachaparral.org/threats/cal-fire/> for details on their opposition to the VTP.

I sent links to the staff reports to the Chaparral Institute and to the California Native Plant Society. You should expect to hear from them.

You can contact Richard Halsey, Director, at [rwh@californiachaparral.org](mailto:rwh@californiachaparral.org) for more information on their concerns

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David Grubb  
[davidzgrubb@gmail.com](mailto:davidzgrubb@gmail.com)  
760-613-5034 cell  
760-753-0273 home/office

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