

CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT
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W13a

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to staff report

MCO-NOID-0001-25
(Alila Ventana Big Sur Fuels Treatment Project)

MARCH 12, 2025

CORRESPONDENCE

From: [Trey Kropp](#)
To: Amitay.Shahar@Coastal
Cc: publiccomment@coastal.ca.gov
Subject: Public Comment – Alila Ventana Big Sur Fuels Treatment Project
Date: Tuesday, February 18, 2025 9:26:41 PM

Dear Commissioners,

I am writing to formally **oppose the approval of the Alila Ventana Big Sur Fuels Treatment Project** and urge the California Coastal Commission to **deny the Notice of Impending Development**. This project conflicts with the **Big Sur Coast Land Use Plan**, threatens **critical viewshed protections**, introduces **unnecessary vegetation removal**, and repeats the **mistakes of past failed fuel reduction projects** in the region.

1. Violation of the Big Sur Coast Land Use Plan (BSCLUP)

The **BSCLUP strictly regulates vegetation removal** to protect the natural landscape and ensure development remains **subordinate to the environment**. The Ventana project violates multiple provisions:

- **BSCLUP Policy 3.3.2.1 (Vegetation Removal):** “The removal of native vegetation shall be restricted to the minimum amount necessary for development.”
 - The project proposes **removal of native redwoods, coast live oaks, and chaparral across 62 acres** without evidence of necessity.
- **BSCLUP Policy 3.3.2.3 (Chaparral Protection):** “Chaparral is a natural and important plant community in Big Sur and shall not be indiscriminately removed under the assumption that it is a fire hazard.”
 - The project **targets native chaparral for removal**, despite its **critical role in erosion control, wildlife habitat, and fire resilience**.
- **BSCLUP Policy 3.2.4 (Critical Viewshed Protection):** “New development shall be subordinate to the natural character of the landscape and shall not detract from public views.”
 - The project will **open up views of resort structures**, increasing the **visual intrusion of development within the Big Sur critical viewshed**.

2. No Demonstrated Need – No History of Fire Threat to Ventana Beyond Existing Defenses

There is **no documented history of wildfire directly threatening Alila Ventana Big Sur** beyond what its current fire mitigation measures already address.

- The **project documents fail to cite any instances** where Ventana’s existing defenses were insufficient.
- **Redwoods, coast live oaks, and chaparral** are naturally **fire-adapted ecosystems** that

should not be removed under the false premise of fire safety.

3. Disrespectful and Unfounded Claim That Big Sur's Forests Are "Unhealthy"

The **Resource Conservation District of Monterey County (RCDMC)** claims that Big Sur's forests are **"unhealthy"**, which is both **incorrect and disrespectful** to one of California's most ecologically intact landscapes.

- Big Sur's forests **evolved with natural fire cycles** and do not require human intervention to be "restored."
- The idea that these forests need **"management" to be fire resilient is a misleading justification for unnecessary vegetation removal.**

4. Past Fuel Reduction Projects Have Led to Fires, Environmental Damage, and Noise Pollution

This project repeats the **failures of past fuel reduction efforts**, which have resulted in **wildfires, environmental damage, and major disruptions** to Big Sur's rural character.

- **The Palo Colorado Fuel Break Fire (2023):**
 - A fuel break project caused a wildfire when contractors **sparked a fire with their equipment.**
 - Instead of reducing fire risk, the project **created a fire hazard.**
- **The Mt. Manuel Fuel Reduction Project (2022):**
 - Contractors **left behind piles of trash, oil cans, and debris**, showing **poor environmental oversight.**
- **The Rancho Rico Fuels Mitigation Project (2023):**
 - The **landowners had to scale back the project** because it was **overwhelming and too destructive.**
 - The **constant noise of 20 chainsaws for weeks** was an unbearable disruption to neighbors.

5. Noise Pollution and Disruption to the Peace and Tranquility of Big Sur

Big Sur's **rural and natural character is protected under the BSCLUP**, and this project introduces **industrial-scale noise pollution**:

- **BSCLUP Policy 5.4.3.1 (Noise and Land Use Compatibility):**
 - "New development shall not result in noise levels inconsistent with the rural and natural environment of Big Sur."

- **Chainsaws, chippers, and heavy machinery will disrupt** the soundscape for **two years**, with ongoing maintenance operations indefinitely.

6. Lack of Public Participation and LUAC Review

This project **bypassed the required local public review process**:

- **The Local Land Use Advisory Committee has not reviewed this project**, despite its significant environmental impacts.
- **There has been no meaningful public engagement**, which violates the intent of the Coastal Act's public participation requirements.

Conclusion – The CCC Must Deny the NOID and Require a Full Coastal Development Permit

This project is not only **unnecessary**, but it **sets a dangerous precedent for excessive and destructive vegetation removal in Big Sur**.

Given the **violation of BSCLUP policies**, the **absence of demonstrated wildfire risk**, and the **repeated failures of past fuel reduction projects**, we urge the CCC to:

1. **Deny the NOID** for the Alila Ventana Big Sur Fuels Treatment Project.
2. **Require a full Coastal Development Permit (CDP) and Environmental Impact Report (EIR)** before any vegetation removal is considered.
3. **Ensure that LUAC and the public are given full participation in this process.**

Big Sur's forests do not need to be "fixed" – they need to be **protected**. The CCC must uphold the **Big Sur Coast Land Use Plan** and **reject unnecessary and harmful vegetation removal projects**.

Sincerely,

Trey Kropp

Resident Big Sur, CA

From: [Kodiak Greenwood](#)
To: Amitay.Shahar@Coastal
Subject: fuel reduction in Big Sur
Date: Thursday, February 20, 2025 8:43:03 AM

Hello,

I wanted to share a letter from the Big Sur community in regards to the "Rancho Rico Fuel Reduction Project" and the "RCDMC" in the Big Sur region:

Thank you

Letter:

Preserve Big Sur

Stop the destruction from "Resource Conservation District of Monterey"
and Big Sur "Firewise" organizations.

This notice is concerning RCDMC's "false science" driven plans, and destructive applications to sensitive ecological habitats, environmental areas, critical view sheds in Big Sur and Monterey County areas. These threats or "treatments" are supported under the false pretense that large fires can be reduced through "fuel treatments".

It is critical to understand RCDMC's role and history of abuse in Big Sur. RCDMC was responsible for starting the Palo Colorado fire, through "fuel reduction" on wilderness boundaries, that ignited sparks and created a fire that cost millions of state money to extinguish. Additionally, RCDMC is responsible for leaving massive amounts of garbage including oil cans, fuel cans, human waste, trash bags, food trash, etc., scattered for miles in areas of the Ventana Wilderness, spanning from Mount Manuel, East Molera, Post Summit, and Pico Blanco.

It is essential to identify that these "fuel treatments" will not prevent large fires. The predictability and location of a fire is impossible. Cleared areas will be ready to burn within 8 months of clearing and thinning treatments, effectively making them useless during fire. Studies show that fuel reductions highest success rate is during the fire, implemented hours and days ahead of the fire line advancement. Studies show that remote, or wild land fuel treatments are a waste of time, money, and resources for fire prevention, especially in steep Big Sur landscape, where fires historically jump fuel breaks during fires.

To better understand our unique biodiversity and ecologically sensitive habitats that are Big Sur, it is mandatory to have environmental ecologists and educators who are up to date on the local fire ecology. Big Sur needs representatives who are not being paid as hired exploiters deliberately sharing false forest data for their profit driven agendas. These agendas negatively impact the environment and have little to no use during times of fire. The Big Sur Land Use Policy is specifically designed to protect our diverse and unique ecological areas and it is under direct threats by the RCDMC plans to clearcut chaparral and masticate and thin healthy diverse forests. I take personal offense when our forests are labelled as "overstocked" or "overgrown". These fear based labels do not apply to native habits, they better apply to tree farms, clearcuts, or mono cropping — native forest habitats are not overgrown. The RCDMC is using state guided blanket practices that do not align with Big Sur ecology.

Coastal vegetation treatments, or fuel reduction, is habitat destruction. Not only does this denude and destroy diversity, but these high cost use of resources do not prevent or aid during most wildfires situations. Fuel reduction, and mastication increase fire spread during wind driven fire events, allowing "spotting" or ember casting to spread out of control. Fuel reduction dries out soils, leaves masticated dry slash on the ground and allows highly flammable non native invasive species to spread into the opened scared areas, essentially increasing fire season and making areas more prone and vulnerable to high intensity blazes. At no time has scientific environmental research supported mechanical thinning as a way of enhancing biodiversity or assisting in positively influencing "forest health". The RCDMC does not apply actions that restore ecosystem health, or forest health. RCDMC fails to recognize the myth of fire suppression in the Big Sur region. Big Sur has had over 20 fires since 1960. Big Sur has not benefited from fire suppression, our area has experienced too much fire, the remaining ecological areas are in a recovery period that takes decades post fire to bounce back to healthy fire ready canopies and soils health. Thinning and mastication does not improve soil or reduce non-native invasive species.

Lets build a better resilient community and apply proven tools, like home and structure hardening, five foot clearance zones, home defense practices, improved ignition response times, water storage and sprinkler systems, fire lookout stations etc.

Kodiak Greenwood

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W13a

Prepared March 10, 2025 for March 12, 2025 Hearing

To: Commissioners and Interested Persons

From: Dan Carl, Deputy Director, Central Coast District
Shana Gray, Deputy Director, Statewide Planning Unit
Erin Prahler, Coastal Program Manager, Statewide Planning Unit
Shahar Amitay, Coastal Program Analyst, Statewide Planning Unit

Subject: Additional hearing materials for W13a
Notice of Impending Development No. MCO-NOID-0001-25 (Alila Ventana
Big Sur Fuels Treatment Project)

This package includes additional materials related to the above-referenced hearing item as follows:

Additional correspondence received in the time since the staff report was distributed

AVBS Coastal Commission Hearing

Responses to Public Comment

- **BSCLUP Policy 3.3.2.1 (Vegetation Removal): “The removal of native vegetation shall be restricted to the minimum amount necessary for development.”**
 - **The project proposes removal of native redwoods, coast live oaks, and chaparral across 62 acres without evidence of necessity**

RCDMC Response:

RCDMC worked closely with the Monterey County Planning Department and the Coastal Commission to develop the Public Work Plans coastal standards for our County so that they comply with the Big Sur Coastal Land Use Plan.

- **BSCLUP Policy 3.3.2.3 (Chaparral Protection): “Chaparral is a natural and important plant community in Big Sur and shall not be indiscriminately removed under the assumption that it is a fire hazard.”**
 - **The project targets native chaparral for removal, despite its critical role in erosion control, wildlife habitat, and fire resilience.**

RCDMC Response:

- 1) In reviewing the language for Policy 3.3.2.3 in the BSCLUP, RCDMC did not see any language related to above reference about restricting vegetation removal of chaparral. Regardless, treatment of chaparral outside Defensible Space is currently excluded from the Monterey County Public Works Plan until there is a better understanding of where coastal sage scrub and maritime chaparral habitats are distributed in the County. There is a currently a fine scale vegetation mapping effort underway to determine this.
- 2) There is no chaparral in the proposed treatment area, therefore, the project does not impact chaparral habitat. It does, however, treat coyote brush, which can be a component species of chaparral. Regarding the brush/scrub habitat in the treatment area, several field investigations by TSS and a follow-up field investigation by RCDMC Forest Health Specialist Jamie Tuitele-Lewis determined that there were not any ‘Sensitive’ associations or alliances (S1-S3) with special protections identified in the brush/scrub habitat that could be defined as Coastal Sage Scrub or Chaparral habitat. As previously stated, the Monterey County Public Works Plan

currently excludes any fuels treatment in chaparral in any area outside of Defensible Space.

Because of the presence of *Baccharis pilularis*, *Adenostoma fasciculatum*, and *Toxicodendron diversilobum*, the following CNPS Alliances were given consideration, but were ultimately determined to not be present because of a lack of a clear dominance trend:

- *Baccharis pilularis* Shrubland Alliance (Coyote brush scrub: CDFW CA Code 32.060.00), with State and Global rarity rankings of S5 and G5;
- *Adenostoma fasciculatum* Shrubland Alliance (Chamise chaparral: CDFW CA Code 31.101.00), with State and Global rarity rankings of S5 and G5, respectively;
- *Toxicodendron diversilobum* Shrubland Alliance (Poison oak scrub: CDFW CA Code 37.940.00), with State and Global rarity rankings of S4 and G4, respectively, and;
- *Cytisus scoparius*, *Genista monspessulana*, *Cotoneaster* spp. Shrubland Semi-Natural Alliance (Broom patches CDFW CA Code 32.180.00), with no State or Global rarity ranking designations.

It may also be worth noting that none of the above-mentioned alliances are even considered ESHA as they are not ranked S1-S3.

- **BSCLUP Policy 3.2.4 (Critical Viewshed Protection): “New development shall be subordinate to the natural character of the landscape and shall not detract from public views.”**
 - **The project will open up views of resort structures, increasing the visual intrusion of development within the Big Sur critical viewshed.**

RCDMC Response:

The proposed treatments will not open public views of the resort structures and there will be no impact to view shed.

Mt. Manuel Forest Service Project – Trash/Oil Cans

RCDMC Response:

The trash and oil cans left behind on Mt. Manuel belonged to a Forest Service Project that RCDMC was not involved with in any capacity.

Fire

RCDMC Response:

RCDMC was the project manager for a shaded fuelbreak treatment project that occurred in June 2024 on the Los Padres National Forest, Monterey Ranger District. On June 17th, 2024, a small wildfire was ignited accidentally by a crew member implementing the treatment, most likely from a chainsaw hitting a small rock. It started a small grass fire that was initially contained by the crew with backpack pumps but an escape from the containment area re-ignited a larger fire, triggering a larger response from CALFIRE, Forest Service and local fire crews. The Forest Service investigation into the start of the fire ruled that it was accidental and not a result of gross negligence. The RCDMC was able to start the project up approximately two months later to successfully and safely complete the remaining treatment with significant mitigations and resources in place at the request of the Forest Service.

From: [Big Sur](#)
To: Amitay.Shahar@Coastal
Subject: RCDMC Ventana
Date: Friday, March 7, 2025 9:42:05 AM

Hello,

The Big Sur community is concerned of the plans from the RCDMC conducting habitat removal at Ventana Inn Big Sur. RCDMC was responsible for starting the Palo Colorado fire conducting fuel reduction in 2024 here in Big Sur. Furthermore, the RCDMC also left thousands of pounds of trash, fuel cans, human waste, and plastic scattered in the wilderness see link below. After close review we found that the RCDMC has not acknowledged the Big Sur Land Use Policy regarding protected habitats and endangered species along with critical viewshed areas. The California Coastal Commission has a responsibility to uphold the Big Sur LUP. The RCDMC has plans to move forward without addressing the LUP and its historical and ecological significance. It is essential to halt these operations until the LUP is addressed and a solution is reached. Please see links. Thank you for your time.

Links:

Trash

<https://kodiakgreenwoodphotography.pixieset.com/mountmanuelbigsurherbicideandhabitatdenuding/>

Fire

https://www.montereycountynow.com/blogs/news_blog/firefighters-are-working-on-containment-for-the-coast-fire-in-big-sur/article_879eb62e-2dc2-11ef-ab62-877adf2af7dc.html

Letter of opposition:

<https://documents.coastal.ca.gov/reports/2025/3/W13a/W13a-3-2025-corresp.pdf>

Tim

From: info@salinatribe.com
To: Amitay_Shahar@Coastal
Subject: Re: Formal Notification of Proposed Development
Date: Friday, March 7, 2025 3:59:16 PM

Greetings Shahar, we have reviewed the proposed project and are requesting that all ground disturbing activities be monitored by a cultural resource specialist from our tribe.

Xayatspanikan,
Patti Dunton, administrator

On 2025-02-05 13:50, Amitay, Shahar@Coastal wrote:

> Dear Tribal Administrator Dunton,
>
> Attached is a formal notification of an upcoming project in the
> Coastal Zone which may be of interest. Coastal Commission staff
> received indication from the Native American Heritage Commission that
> the result of the Sacred Lands File check is positive. Therefore,
> Coastal Commission staff would like to consult with California Native
> American Tribes on the proposed project (detailed in the attachment)
> to understand the Tribal Interests, including Tribal Cultural
> Resources, which may be impacted by the proposed development. If
> interested in the consultation process, please respond to this email
> as soon as possible, as we are aiming to schedule the project for the
> March 12-14, 2025 public Coastal Commission hearing. Likewise, you may
> call me at the number listed below.
>
> Shahar Amitay | Coastal Program Analyst
>
> CALIFORNIA COASTAL COMMISSION
>
> Statewide Planning Unit
>
> 301 E. Ocean Blvd, Suite 300
>
> Long Beach, CA 90802
>
> (562) 395-9446 [1]



W13a Marx

Community Association of Big Sur
Fire Adapted Big Sur
PO Box 59, Big Sur, CA 93920

Caring for the coast for over 50 years

Community Association of Big Sur is a 501 (c) 3 (EIN 77-0091132). Our shared mission is to protect and defend the rural and residential character, and to preserve the natural and aesthetic beauty of the Big Sur coast; to provide for the health, safety, and welfare of the Big Sur Community; to encourage community service and otherwise act in the interests of the residents and property owners of the community. CABS is committed to a collaborative approach towards responsible land stewardship. CABS believes that an effective partnership between private and public property owners is essential for a sustainable and healthy community.

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MCO-NOID-0001-25

Alila Ventana Big Sur Fuels Treatment Project

Letter of Support

Dear Commissioners,

Fire Adapted Big Sur, a program of the Community Association of Big Sur, supports the Public Works Plan for ecological restoration, defensible space, and electrical distribution line treatments at the Alila Ventana Big Sur Resort.

Preventing the spread of wildfire in populated areas requires spaces that are safe for and defensible by firefighters. The proposed work provides such spaces.

Alila Ventana Big Sur (Ventana), with neighbors Post Ranch Inn (Post) and Nepenthe, are the largest private employers in Big Sur. They also provide employee housing. Ventana is the neighborhood's first line of defense for wildfire that approaches from the adjacent forest, wildfire that can easily spread to neighboring properties. Because of their shared fate, Ventana, Post, Nepenthe, and the Coastlands residential community formed Big Sur's first Firewise USA® community. The goal of Firewise is to prevent residential and business structures from burning when wildfire enters the community, focusing on defensible space and structure hardening.

Ventana is also at risk for wildfire ignitions due to downed power lines during wind events. As a former firefighter, I responded to two such events, both producing significant fires, that if not suppressed early, had the potential to burn across the region.

The loss of Ventana, Post, and Nepenthe to wildfire would be catastrophic for Big Sur, impacting the County of Monterey and the State of California. With the loss of lodging, restaurants, and workforce housing, coastal access for visitors would suffer, and the resulting burn scar would call into question the viability of rebuilding the area.

Thank you for your consideration.

Sincerely,

Rayner Marx

Program Manager, Fire Adapted Big Sur
Community Association of Big Sur