

California Native Plant Society

Dorothy King Young Chapter · P.O. Box 985 · Point Arena CA 95468

December 12, 2009

California Department of Forestry and Fire Protection
135 Ridgway Avenue
Santa Rosa, CA 95401
Ken McLean & Leslie Markham

Re: 1-08NTMP-009 MEN

Dear Mr. McLean and Ms. Markham:

These comments are submitted by the Dorothy King Young Chapter of the California Native Plant Society (CNPS). Please consider this a request that this letter be included in the administrative record for 1-08NTMP-009 MEN (the Bower NTMP).

CNPS comments are based on the understanding that the Timber Harvest Plan process is intended to be equivalent to a review process under the California Environmental Quality Act (CEQA).

NTMP documents, like all CEQA review documents, must assure the public that California's environmental regulations have been followed so that all potential environmental impacts are considered, and outline steps for the avoidance of such impacts or provide suitable mitigation measures as needed.

Seeding For Erosion Control – 923.4(h): CNPS is pleased to note plans for using native species and/or sterile grasses (though care should be taken to avoid sterile perennial grasses that could spread vegetatively). CNPS questions the use of buckwheat, *Fagopyrum esculentum*. Why the inclusion of this plant species which is not native to the West Coast at all?

Botanical Surveys: The CNPS position is that botanical surveys that comply with CNPS Guidelines for Botanical Surveys and the CA Department of Fish and Game's Guidelines are needed to assure the public that CEQA-equivalent process has been followed with respect to plants.

Upland late seral habitat (i.e., "old growth") The 18 acres of late-seral redwood forest in Unit 9 constitutes a significant old growth stand, even though it just misses the FPRs requirement for 20 acres. CDF should give considerable weight to the fact that late-seral forest is very scarce in Mendocino County, and especially so in the County's South Coast region.

The 18-acre stand is described by DFG as equivalent to old growth in terms of its habitat functions. For example, DFG cited high wildlife value due to structural defects in large trees, which enhance their value to wildlife, including rare and endangered animals. There are 11 animal species, including rare taxa, that are largely dependent on late-seral habitat features.

CNPS advocacy for protection of native plants includes typical regional species and alliances and rare species and plant alliances. Within this framework, CNPS understands that wild-life habitat value is a prime rationale for preserving native plant species and habitat structural characteristics.

There are issues regarding DFG's determinations that the 18 acre stand qualifies as Wildlife Habitat Relationship 5M, 5D or 6. CNPS review finds that DFG staff provided strong supporting data for DFG conclusions. Of particular concern is the DFG finding that the project proponent's data gathering methods did not allow for reliable determination of WHR status.

CNPS appreciates and concurs with DFG's thoughtful analysis of the wildlife habitat and ecological services contained in the late-seral portion of the NTMP.

CNPS agrees with the DFG recommendation that timber operations should retain all late and diverse seral components in WLPZs, and define such components as conifers equal to or greater than 40 inches DBH and at least 200 in age.

Silvicultural methods in Unit 9: The selection and group selection methods proposed for Unit 9 are, in effect, mini-clearcuts. CNPS is persuaded that such methods would degrade the habitat and ecosystem services values of the late-seral stand.

Cumulative impacts: CNPS agrees with the DFG assessment that the NTMP fails to address potential cumulative impacts to late-seral forest values in the Biological Assessment Area. The absence of expected large-size trees within the project site, and particularly the late-seral habitat, points to cumulative adverse impacts due to previous timber entries. CNPS requests that cumulative impacts be re-assessed, with appropriate mitigations designed to reduce to a level of insignificance the expected additional impacts.

Watercourses and floodplains: Although DFG's recommendations are designed to ensure optimal habitat and conditions for animal species, CNPS believes that these recommendations will also provide considerable benefit to native plants – downstream as well as on the project site.

DFG's recommendations can also be seen to take into account long-term economic benefits, since healthy ecosystems ultimately bring economic benefits on a regional level. Retention of ecosystem values is consistent with the intent of the California Environmental Quality Act.

Indeed, the Forest Practices Act requires CDF to balance a timberland owner's desire for profit with the public's interest in "protecting soil, air, fish and wildlife, and water resources from unreasonable degradation." The following language invokes the public's interest in multiple values:

Sect. 4512 (c) "The Legislature thus declares that it is the policy of this state to encourage prudent and responsible forest resource management calculated to serve the public's need for timber and other forest products, while giving consideration to the public's need for watershed protection, fisheries and wildlife, and recreational opportunities alike in this and future generations."

CNPS members look forward to receiving feedback from your agency with regard to this NTMP and the public's comments about it.

Sincerely,

Lori Hubbart
Dorothy King Young Chapter, California Native Plant Society