



December 20, 2020

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Subject: **DKY CNPS additional comments on THP 1-20-00193-MEN (“Mitchell Creek”)**

Dear Ms. Rhoads and Mr. Powers:

The Dorothy King Young (DKY) Chapter of the California Native Plant Society (CNPS)<sup>1</sup> submitted preliminary comments, dated November 23, 2020 on THP 1-20-00193-MEN. Since that time and after conducting more site visits, we have the following additional comments to submit for the record:

1. It appears that the “fuel treatment” area in the western section of the Mitchell Creek THP is highly likely to be a sensitive natural community. As such it should not be subjected to a fuel treatment study or any attempt to convert to a redwood forest.

2. The list below is a **partial** list of potential sensitive natural communities that occur in soils that do not support redwood forests nor Mendocino Cypress woodlands.

88.100.01Y S1G2 *Abies grandis* – *Tsuga heterophylla* / *Polystichum munitum* G1S1

87.070.01Y *Pinus muricata* – *Pseudotsuga menziesii* G3S3

87.070.04YS2G2 Provisional *Pinus muricata* / *Arctostaphylos glandulosa* G2S2

87.070.07Y *Pinus muricata* / *Xerophyllum tenax* sensitive not ranked

87.070.09YS2G2 *Pinus muricata* – *Chrysolepis chrysophylla* / *Arctostaphylos nummularia* G2S2

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87.070.11YS3G3 Provisional *Pinus muricata* – *Notholithocarpus densiflorus* 87.070. G3S3

3. The current 3/2018 CDFW Botanical Survey Protocol requires surveying for sensitive natural communities and sensitive plant species:

**“BOTANICAL FIELD SURVEYS**

*Evaluate the need for botanical field surveys prior to the commencement of any activities that may modify vegetation, such as clearing, mowing, or ground-breaking activities. It is appropriate to conduct a botanical field survey when:*

- *Natural (or naturalized) vegetation occurs in an area that may be directly or indirectly affected by a project (project area), and it is unknown whether or not special status plants or sensitive natural communities occur in the project area;*
- *Special status plants or sensitive natural communities have historically been identified in a project area; or*
- *Special status plants or sensitive natural communities occur in areas with similar physical and biological properties as a project area.”*

From the CDFW 2019 Protocol for surveying natural communities:

*“Sensitive natural communities are communities that are of limited distribution statewide or within a county or region and are often vulnerable to environmental effects of projects. These communities may or may not contain special status plants or their habitat. CDFW’s List of California Terrestrial Natural Communities is based on the best available information, and indicates which natural communities are considered sensitive at the current stage of the California vegetation classification effort. See the Vegetation Classification and Mapping Program (VegCAMP) website for additional information on natural communities and vegetation classification”*

Please do not hesitate to contact us ([conservation@dkycnps.org](mailto:conservation@dkycnps.org) or [rareplants@dkycnps.org](mailto:rareplants@dkycnps.org)) if you have questions regarding our comments, or if we can be of assistance in developing recommendations for protecting rare plants and sensitive vegetation types prior to and during the timber harvest review processes.

Respectfully,

*Renée Pasquinelli*

Renée Pasquinelli, Conservation Co-Chair (North)



Dr. Peter Baye, Conservation Co-chair (South)

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*Teresa Sholars*

Teresa Sholars, Rare Plant Coordinator and Vegetation Chair  
Dorothy King Young Chapter, California Native Plant Society<sup>1</sup>

<sup>1</sup>The mission of the California Native Plant Society (CNPS) is to protect California's native plant heritage and preserve it for future generations through application of science, research, education, and conservation. CNPS works closely with decision-makers, scientists, and local planners to advocate for well-informed policies, regulations, and land management practices. A formal cooperative agreement between CNPS and the California Department of Fish and Wildlife (CDFW) is the backbone of California's rare plant and vegetation status review programs. The data compiled and shared by both organizations are used throughout the environmental review process. The Dorothy King Young (DKY) Chapter of CNPS focuses on protecting and providing education about the native plants and natural communities within coastal Mendocino County and we often work directly with local and Sacramento-based CDFW science staff.

cc: Jon Hendrix, Sr. Environmental Scientist, CDFW ([Jon.Hendrix@wildlife.ca.gov](mailto:Jon.Hendrix@wildlife.ca.gov))

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