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NATIVE PLANT SOCIETY

April 3, 2019

Mike Powers, Jackson Demonstration State Forest Manager  
California Department of Forestry and Fire Protection  
802 North Main Street  
Fort Bragg, CA 95437

Terry Bertels, Sonoma-Mendocino Coast District Superintendent  
California Department of Parks and Recreation  
12301 North Highway 1  
Mendocino, CA 95460

RE: Proposed emergency fire evacuation for Simpson Lane/Mitchell Creek Drive area residents

Dear Mr. Powers and Mr. Bertels:

The Dorothy King Young Chapter (DKY) of the California Native Plant Society (CNPS)<sup>1</sup> recently learned of project scoping for an emergency fire evacuation route along Gibney Lane for residents of Simpson Lane and Mitchell Creek Drive through a forwarded letter written by Fort Bragg Fire Chief Steve Orsi. Our greatest concern is that the soils, hydrology, and vegetation of the environment through which the road traverses is made up of physical and biological conditions that prevent reconstruction and maintenance of a viable all-vehicle access road. Given those conditions, upgrading the road could at best be seasonal (the driest time of the year) and still quite challenging for 2-wheel drive low clearance vehicles like Priuses to navigate, especially since drainage will require multiple rolling dips. First and foremost, we support community fire protection efforts that are designed and implemented to be sustainable, effective, reasonably maintained, and minimize impacts to sensitive natural plant communities and rare plants on the Mendocino Coast.

As we understand from Fire Chief Orsi's letter and articles in the local newspapers, the new proposal involves the California Department of Forestry and Fire Protection (CAL FIRE) and California Department of Parks and Recreation (State Parks) upgrading a section of Gibney Lane, south of Fort Bragg that traverses through Jackson Demonstration State Forest (JDSF) and Jug Handle State Natural Reserve (Jug Handle SNR). We are grateful that you (Mike Powers) contacted me (Teresa Sholars, Professor Emeritus, College of the Redwoods), since most of my studies and career have focused on the natural communities that would be affected by the road upgrades, namely the "pygmy forest" and associated vegetation types. We welcome the opportunity to collaborate with agency personnel on such projects, especially prior to and during the scoping phase. We have actively participated in and supported the California Department of Fish and Wildlife (CDFW) with scientific surveys and analysis of vegetation types on the Mendocino Coast. We currently serve on a technical advisory committee for State Parks to assist in the development of management planning for coastal forests that are in decline and affected by climate change. I (Teresa Sholars) also serve on the JDSF advisory committee for recreation to inform appropriate management of trails.

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We also appreciated the opportunity to walk the JDSF section of the Gibney Lane corridor with you, Mike, on March 26, 2019. From our walk and discussions regarding road options and management goals for JDSF, we fully see that this proposed route will not provide viable emergency evacuation for neighboring residents, as was described in Fire Chief Orsi's letter. Simply stated, the physical properties (hydrology and soils) of the road and surrounding forest supersede reconstruction and long-term maintenance for public use by low clearance two-wheel drive vehicles. In addition, the 2008 lightening fires that burned over 50,000 acres in Mendocino County occurred during the month of June after a winter and spring of high rainfall. It is quite reasonable to assume that when such an event happens again, the Gibney Lane road corridor will have ponded water and saturated soils, creating conditions that prevent access for most vehicles. Protection to rare species/vegetation AND protection to humans can both be accomplished by first understanding the physical and biological properties of the site, including the constraints involved in maintaining a viable access road along the Gibney Lane corridor. The following points explain why considering the Gibney Lane corridor as an emergency evacuation route is problematic at best:

1. The hydrology and soils found along the Gibney Lane JDSF and Jug Handle SNR corridor, upon which the unique vegetation is dependent, also create road conditions that challenge the sustainability and maintenance of a road surface that can be used by typical passenger vehicles. In general, soils are shallow and overlay a hardpan layer that results in a perched water table and saturated forest soil conditions throughout much of the year. The underlying soils serve as a "sponge", holding water that very slowly drains to lower elevations to replenish downstream fish-bearing channels and ground water used for domestic purposes (including private wells). Ponding (both year-round and seasonal) is common throughout the "pygmy forest". Ground water readily drains from within cut road banks long after rains have ceased and continues to concentrate and erode surfaces upon which it flows, including roads and trails. Slowing the concentrated water flow and allowing it to sheet back into the forest is a serious challenge, as it requires diverting both exposed ground water and surface water. Road construction and long-term maintenance would be challenging and quite different from road management in a forested environment that drains well and has deeper soils.
2. Road related work along the corridor will require a much higher level of documentation, disclosure, and mitigation for environmental compliance than would normally be required for simple "road maintenance". Much of the road surface is currently in such poor condition that major upgrades and drainage corrections are needed to make it a viable road. The entire route, from Mitchell Creek Drive to the paved portion of Gibney Lane traverses through sensitive natural plant communities, nearly all are associations within the Mendocino Cypress Woodland Alliance (rarest of vegetation types with global and state ranks of G1 and S1 respectively). Rare plants, including California sedge (*Carex californica*, CA Rare Plant Rank (CRPR) 2B.3), Mendocino cypress (*Hesperocyparis pygmaea*, a CRPR 1B.2), and Bolander's pine (*Pinus contorta* ssp. *bolanderi*, CRPR

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1B.2). We would be happy to provide a current map from CDFW and descriptions of the sensitive vegetation types found along the route.

### **Current condition of the road and needed improvements**

We also recognize that the current condition of the road and illegal off-highway vehicle use is impacting the sensitive plant communities and rare plants (as observed when we walked the section of road that traverses JDSF on March 26, 2019 with you, Mike). As such, we applaud your intent, as state managers of JDSF and State Parks, to improve drainage problems, rehabilitate impacted road sections that will be closed, and curtail illegal off-highway activities. As we discussed on-site, DKY supports efforts to:

1. Improve and maintain road drainage for the purpose of dry season emergency and enforcement use mainly by JDSF personnel and researchers as per the EIR approved JDSF management plan, and for public education and appropriate natural resource management as defined under the Public Resources Code stated purpose for state natural preserves (PRC 5019.65).
2. Carefully use rock to create wide drainage lens features within the road surface that disperse water into the adjacent forest, rather than allowing it to concentrate down the road, or onto any other area where it may become channelized.
3. Minimize disturbance of roadside vegetation by trimming back, rather than fully removing plants where possible.
4. Use cut vegetation to block illegal roads and trails and place the cut branches such that they trap water and sediment and facilitate seedling establishment. Successful examples of this technique having been used by park staff and Teresa Sholars are found near the road corridor.
5. Allow natural regeneration of native vegetation on areas that are to be restored; ample native seed is available on-site, no planting of seedlings is necessary or desirable.
6. Minimize road grading and ground disturbance; retain low-growing native vegetation where possible to reduce erosion.
7. Control non-native invasive species that occur along the road corridor, including those that may emerge following road-related disturbance and introduction of rock material.
8. Continue to collaborate with DKY volunteers to identify sensitive species and develop site-specific avoidance and mitigation measures. We welcome the opportunity for future site visits and to assist where needed.

### **Superior alternative routes for emergency fire evacuation exist**

In 2011, the Mendocino Department of Transportation, with approval from the County Board of Supervisors, commissioned a feasibility study to identify an emergency evacuation route for the residents of Simpson Lane and Mitchell Creek Drive. The study, entitled ***Feasibility Study for the Mitchell Creek Area Second Connection***, is available on-line at <https://www.mendocinocounty.org/home/showdocument?id=24662>. In February, 2012, the

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County Board of Supervisors voted to accept the feasibility study. The study identified a realistic and more easily achievable emergency route for the residents that did not require using the Gibney Lane corridor. Pertinent excerpts from the study include:

1. **Page 1: “Summary and Recommendations** *Of the seven routes studied, three have fatal flaws and are dropped from further consideration. The two Gibney Lane alternatives traverse the Jug Handle State Reserve, and will not be allowed to be built if other less damaging viable alternatives are available. The Hare Creek alignment is several times more costly than other viable alternatives and is not considered to be a prudent use of public funds. The four remaining alignments, Pearl Drive/Digger Creek, Pearl Drive/Turner Road (two alternatives) and Pearl Drive/Canyon Drive all utilize Pearl Drive at State Route 1 as the termini at the regional transportation network.”*

*“The Mitchell Creek Area Second Connection is certainly feasible, and as a project of local significance, it should be advanced into the environmental assessment and preliminary engineering phase as soon as funding can be secured. From the results of the scoring criteria of this feasibility study, the Pearl Drive / Canyon Drive Alternative is recommended as the single alternative to be considered for further study. This alternative meets the project Purpose and Need, and provides the best combination of engineering and construction feasibility with the best balance of overall benefits and minimization of impacts nearby residents.”*

2. **Page 13:** *“As indicated in the environmental summary report, there are established Pygmy Forests directly in the path of these proposed alignments. Also, the State Parks Department has submitted a letter in opposition to using any of the Jug Handle State Reserve for a new road. The environmental concerns are considered a fatal flaw when combined with the fact that the alignments are too far south to fully satisfy the project purpose and need. Therefore, following the second public meeting on June 16, 2011, both Gibney Lane alignments were dropped from further consideration.”*
3. **Page 54?: “Environmental Impacts - Score 0 - Gibney Alignments –** *The Gibney Lane Alignments are clearly the worst choice from an environmental perspective. They pass through a State Park that contains sensitive pygmy forest lands. It is unlikely that these alignments would ever survive the CEQA and NEPA processes given the fact that there are other viable alternatives that don’t have anywhere near the environmental issues these alignments have.”*

Fire also occurs naturally on the Mendocino Coast and the plant communities found here are adapted to and thrive under a limited fire regime. We fully support fire safety goals that include improving fire resiliency on a landscape level by conducting controlled burns in the native vegetation that is adapted to burning, including “pygmy forest”, associated cypress woodland, bishop pine, and redwood forests. DKY volunteer scientists would be happy to provide additional information regarding the fire ecology of local plant communities to interested neighbors and to work with CAL FIRE to advise the development of burn plans for these

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forested areas to reduce fuel loading. We also fully support and would be available to help advise measures that individual homeowners can take to address landscape vegetation issues around homes to reduce flammability.

In summary, it is unrealistic to assume that the Gibney Lane corridor can be maintained as a dependable emergency exit for neighboring residents, given the soils, hydrology, sensitive vegetation within the area, and uncertain state budgets (especially for State Parks). The DKY Chapter of CNPS supports CAL FIRE and State Park efforts to conduct carefully planned minimal road maintenance and improvement work to reduce the current deleterious erosion and drainage problems along the Gibney Lane corridor that transects JDSF and Jug Handle SNR. Road improvements should be for the purposes set forth under the management plan for JDSF and State Park policies for natural reserves. Given the extent of sensitive vegetation that will be impacted (even incidentally) during road work, preparation of a mitigated negative declaration (or supplemental EIR to the JDSF plan) will likely be required for CEQA compliance. A County accepted feasibility study, completed within recent years, identified a viable route for residents of the Simpson Lane and Mitchell Creek Drive areas that should be pursued as the primary emergency exit, not only in the event of a wildfire, but for other potential emergency situations as well. We would be happy to provide information to interested neighbors and assist CAL FIRE in control burn planning to improve forest health and resiliency and to reduce wildfire risks. We would also be happy to participate in additional on-site meetings and tours to help inform road and forest management activities.

Please do not hesitate to contact us if you have questions regarding our comments, or would like to schedule another on-site meeting (Teresa Sholars at [tsholars@mcn.org](mailto:tsholars@mcn.org) or Renée Pasquinelli at [marshpas@wildblue.net](mailto:marshpas@wildblue.net)).

Respectfully,

*Teresa Sholars    Renée Pasquinelli*

Teresa Sholars, Rare Plant Coordinator and Vegetation Chair  
Renée Pasquinelli, Conservation Co-Chair (North)  
Dorothy King Young Chapter, California Native Plant Society.

cc:     Brendan O'Neil, Sr. Environmental Scientist (supervisor), CA State Parks  
       Terra Fuller, Sr. Environmental Scientist, CA State Parks

<sup>1</sup>The mission of the California Native Plant Society 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. The Dorothy King Young (DKY) Chapter of CNPS focuses on protecting native plants and sensitive natural communities within coastal Mendocino County, and on providing education about the science and significance of these species and communities.

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