



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

May 8, 2026

**RE: Agenda Item Th13a; Notices of Impending Development No. VTP-NOID-0001-26
(University of California at Santa Cruz Wildfire Vegetation Management Project)**

Hearing Date: May 14, 2026

Position: Support Staff Modifications; Request Further Modification

Dear Chair Harmon and Commissioners,

Thank you for the opportunity to comment on this Notices of Impending Development (NOID). The Sierra Club is generally supportive of the proposed treatments in the Coastal Zone area of this Vegetation Management Project, although with strong objection to some aspects, as discussed below. The Sierra Club appreciates the opportunity provided by the Santa Cruz Coastal Commission staff to discuss our concerns.

This NOID covers 270 acres in the Coastal Zone out of a total of 2,017 acres in the overall UCSC VMT project. The acreage involved in the Coastal Zone perhaps presents a land area that can be sufficiently reviewed without later sub-project by sub-project review. It is surprising, however, that this project, as submitted, proposed revisions to the CalVTP Standard Project Requirements (SPRs) and Mitigation Measures.

The Sierra Club opposes the proposed removal of the CalVTP SPRs and Mitigation Measures.

1. The Sierra Club supports Special Condition 8 which retains SPRs GEO-1 and HAZ-1, and Mitigation Measure BIO-4 and appreciates the staff recommendation.
2. The Sierra Club requests that SPR HYD-4 also be retained.
3. The Sierra Club supports Special Condition 6 which prohibits work in areas of chaparral and coastal sage scrub and appreciates the staff recommendation.

This proposed Vegetation Management Project, like others before it, raises significant concerns about preserving forest health. Our concerns and requests are as follows:

Elimination of 90% of Alliance Plants

The Addendum proposes to “Retain vegetation by alliance level to achieve a horizontal crown separation of approximately 25-100 feet between stands and individual plants depending on site specific characteristics, with approximately 10 percent retention per acre.”

The PEIR specifies that Treatments must not convert native community to non-native or more-flammable state. However, the proposed treatment for forested communities would allow elimination of up to 90 percent of alliance trees and understory vegetation. In coastal fog-belt redwood–Douglas-fir and Douglas-fir–tanoak–madrone stands, opening the understory to 10–25% relative cover is a known recipe for invasion by French broom, coyote brush, and non-native annual grasses, particularly on sites already disturbed by mechanical mastication. The plan targets post-treatment tree densities of 100–200 trees/acre from a 300–600+ trees/acre baseline — a 33–83% stem reduction in the overstory — plus near-complete removal of small-diameter understory conifers, plus authorization to remove Douglas-firs up to 24 inches DBH under the "encroachment" exception (p. 2-13) plus reduce canopy spacing to individual clusters separated by as much as 100 feet (p. 2-13). This exceeds what SPR BIO-5 would tolerate in any stand, particularly any classified as a sensitive natural community, and the plan's only mitigation measure is monitoring with adaptive management only "if ... risk or potential for type conversion" (p. 2-11). There is no criteria for what would constitute a type-conversion threshold in mixed conifer or hardwood forest, no pre-treatment evaluation of invasive colonization potential, and no alternatives comparison against a moderate (20–40%) thinning regime.

For a coastal fog belt mixed-conifer and hardwood physiography that supports Anderson's manzanita, Ohlone tiger beetle, Point Reyes horkelia, all within a U.C. Natural Reserve, the plan's 10% alliance-level retention benchmark with adaptive management required only *after* impacts are realized, is inconsistent with Coastal Act ESHA policies, violates numerous of County LCP regulations in Title 16, and could potentially inflict multiple, significant adverse impacts:

- produce catastrophic population reductions of both vertebrate and invertebrate wildlife,
- eliminate nursery habitat for deer, bats and myriad other wildlife and eliminate corridor habitat in violation of BIO-5,
- eliminate mycorrhizal species in a high-diversity fungal province and depress or eliminate fungi essential for redwood, Douglas fir and hardwood survival,
- and potentially cause habitat type conversion to a ruderal association of French broom, invasive grasses, coyote brush – all highly flammable species – in direct violation of CalVTP and PEIR standards.

Please add the following conditions of approval:

1. Alliance vegetation shall be reduced by no more than 60%, with canopy separation no greater than 25 feet.
2. The Addendum shall be revised to add conversion prevention guidelines for conifer-hardwood stands triggered by the presence, proximity or density of invasive species or human-vector seed transmission corridors.
3. To maintain mycorrhizae inoculation, hardwood stems shall be retained in 25-foot proximity to retained Coast redwood and Douglas fir clusters (and stems >24" dbh).

4. Provide an alternatives comparison that includes a 20–40% thinning, of alliance / understory vegetation, and targeted-invasive-removal scenario, together with canopy height reduction measures.

Snags

The addendum states:

Retain approximately 4-6 foraging snags (<12" DBH) and 1-2 cavity nesting snags (>12" DBH) per acre"; retain ~10 tons/acre downed woody debris, preference >12" diameter logs; retain "legacy trees, openings" (p. 2-17).

However, no guidance or definitions are provided on what comprises a foraging snag or cavity nesting snag. The absence of actively foraging birds, acorn woodpecker granaries or nest holes does not obviate habitat value for foraging or nesting. All snags provide habitat for foraging or nest cavity excavation. The pervasive removal of snags from forested lands has precipitated declines in a wide variety of cavity nesting birds, bats, Western gray squirrels and other wildlife (in addition to causing the extinction of the ivory-billed woodpecker). Cavity nesting birds are declining across the United States including within Santa Cruz County.

Please add a condition of approval that eliminates equivocation with respect to snags, to wit:

1. Retain a minimum of eight snags per acre.

Mechanical Treatments

The Coastal Parcels do not comprise sufficient acreage to warrant use of bulldozers with either rakes or smooth blades, and no trees large enough to require skidding should be removed. Please add a condition prohibiting bulldozers.

Riparian

Rural riparian corridors defined by the County of Santa Cruz lands within 50 feet of any perennial, watercourse, and 30 feet from any intermittent or ephemeral watercourse. Both types are found throughout the Coastal parcels. Please require the vegetative map to be updated to reflect and comply with County riparian ordinance by designating County-jurisdictional riparian corridors of 100' widths.

Any treatment of riparian habitat that entails removal of trees, understory or any other vegetation requires a riparian exception issued by the county of Santa Cruz. Absent same, such vegetation removal is considered development activity and prohibited by Santa Cruz County Code (SCCC) [Section 16.30.040](#). No exemptions are offered for fire clear-backs or thinning.

Please add a condition of approval that states:

1. No vegetation removal within 50 feet of a watercourse is permitted without a riparian exception issued by the County of Santa Cruz.

Thank you for your consideration of these comments.

Sincerely,

Nancy Okada
Co-Chair, Sierra Club California Coastal Committee

Michael Guth,
Chair, Santa Cruz County Group of the Ventana Chapter of the Sierra Club