



September 21, 2018

Sam "Vandy" Vandewaters  
Planner II  
Mendocino County Planning and Building Services  
120 West Fir Street  
Fort Bragg, CA 95437

**Subject:**

**Response to Preliminary Biological Scoping Survey - Minor Subdivision MS 2018-0001  
31120 Thomas Lane, Fort Bragg, CA, APN 019-333-18**

Dear Mr. Vandewaters:

The Dorothy King Young (DKY) Chapter of the California Native Plant Society has reviewed the preliminary biological scoping survey report from Wynn Coastal Planning for the subject proposed Minor Subdivision MS 2018-0001. Thank you for forwarding the report to us for comment as we had requested.

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.

Review of Wynn Coastal Planning's preliminary biological survey and site photographs show property that, until recently, supported sensitive natural communities, but is now severely impacted by illegal clearing. To our knowledge, no permits or regulatory approvals have been granted for this work. The preliminary biological survey report describes adjacent intact sensitive vegetation as what was likely to have occurred on the subject property prior to clearing: Bishop pine forest (G3 S3.2), Mendocino cypress-Bolander pine forest (G2 S2), Mendocino cypress-labrador tea forest (G2 S2).

The map and sensitive vegetation list (Figures 1 and 2) by California Department of Fish and Wildlife's Vegetation Classification Division (VegCamp) has the most current official vegetation designations for the site (source: Classification and Mapping of Pygmy Forest and Related

*Protecting California's native flora since 1965*

2707 K Street, Suite 1 Sacramento, CA 95816-5113 • Tel: (916) 447-2677 • [www.cnps.org](http://www.cnps.org)

**Dorothy King Young Chapter P. O. Box 577, Gualala, California 95445**



Mendocino Cypress (*Hesperocyparis pygmaea*) Vegetation, Mendocino and Sonoma Counties, California. Unpublished report and map, VegCAMP, CDFW September 2018). The VegCamp map and list show that, prior to clearing, the property actually contained a vegetation type of even greater rarity (*Hesperocyparis pygmaea* – *Pinus contorta* ssp. *bolanderi*/*Rhododendron columbianum* Association G1 S1<sup>1</sup>) than those described by Wynn Coastal Planning. As noted in the preliminary biological survey report, *Hesperocyparis pygmaea* (Mendocino pygmy cypress) and *Pinus contorta* ssp. *bolanderi* (Bolander pine) are rare plant species, both with California Rare Plant Ranks of 1.B.2. The report also describes the occurrence of jurisdictional wetlands on the property that were severely impacted by grading, and a trench that was dug to drain shallow ground water off property to the north. Survival of the sensitive vegetation types and rare species is dependent upon naturally occurring shallow ground water.

CNPS agrees with the statement in the preliminary biological survey report that reads “there are significant special status natural resources present that would impede a process to obtain a minor subdivision on this parcel”. Further biological survey on a property such as this with extensive vegetation clearing would likely be futile at this time. It appears that the vegetation clearing was completed recently and prior to any environmental review. As such, CNPS recommends that the County pursue enforcement action against responsible parties, and that a condition of enforcement for any violations be the formulation and implementation of an ecological restoration plan for the impacted areas. CNPS also recommends that the County consult with CDFW, the Army Corps of Engineers, and the Regional Water Quality Control Board regarding potential nonpermitted impacts to sensitive resources under their respective jurisdictions, and to discuss restoration measures that may be appropriate to attempt vegetation and ecosystem function recovery.

---

<sup>1</sup> Global Ranking

**G1 = Critically Imperiled** — At very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors.

**G2 = Imperiled** — At high risk of extinction due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors.

State Ranking

**S1 = Critically Imperiled** — Critically imperiled in the state because of extreme rarity (often 5 or fewer occurrences) or because of some factor(s) such as very steep declines making it especially vulnerable to extirpation from the state/province.

**S2 = Imperiled** — Imperiled in the state because of rarity due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors making it very vulnerable to extirpation from the nation or state/province.

*Protecting California's native flora since 1965*

2707 K Street, Suite 1 Sacramento, CA 95816-5113 • Tel: (916) 447-2677 • [www.cnps.org](http://www.cnps.org)

**Dorothy King Young Chapter P. O. Box 577, Gualala, California 95445**



CALIFORNIA  
NATIVE PLANT SOCIETY

The DKY Chapter has professional science volunteers that can assist the County and the biological consultants with ecologically based recommendations for potential site recovery. If you would like us to join you in a site visit, or have any questions, please contact Teresa Sholars ([tsholars@mcn.org](mailto:tsholars@mcn.org)) or Renée Pasquinelli ([marshpas@wildblue.net](mailto:marshpas@wildblue.net)).

Respectfully,

*Teresa Sholars*

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

cc: Daniel Harrington, Environmental Scientist, California Department of Fish and Wildlife  
([daniel.harrington@wildlife.ca.gov](mailto:daniel.harrington@wildlife.ca.gov))

*Protecting California's native flora since 1965*

2707 K Street, Suite 1 Sacramento, CA 95816-5113 • Tel: (916) 447-2677 • [www.cnps.org](http://www.cnps.org)

**Dorothy King Young Chapter P. O. Box 577, Gualala, California 95445**



CALIFORNIA  
NATIVE PLANT SOCIETY



Figure 1. Mapped vegetation types on the property at 31120 Thomas Lane, Fort Bragg, CA. HEPI-PICOBORHCO = *Hesperocyparis pygmaea* – *Pinus contorta* ssp. *bolanderi*/*Rhododendron columbianum* Association G1 S1 (source: Classification and Mapping of Pygmy Forest and Related Mendocino Cypress (*Hesperocyparis pygmaea*) Vegetation, Mendocino and Sonoma Counties, California. Unpublished report and map, VegCAMP, CDFW September 2018).

*Protecting California's native flora since 1965*

2707 K Street, Suite 1 Sacramento, CA 95816-5113 • Tel: (916) 447-2677 • [www.cnps.org](http://www.cnps.org)

**Dorothy King Young Chapter P. O. Box 577, Gualala, California 95445**





# CALIFORNIA NATIVE PLANT SOCIETY

## Ranking Calculator results for Mendocino cypress and oligotrophic types

VegType	State	Global	Notes
Hesperocyparis pygmaea Alliance	S1	G1	
Hesperocyparis pygmaea - Pinus muricata / Arctostaphylos nummularia Association	S1	G1	
<b>Hesperocyparis pygmaea - Pinus contorta ssp. bolanderi - Pinus muricata / Rhododendron macrophyllum Association</b>	S1	G1	
Hesperocyparis pygmaea - Pinus contorta ssp. bolanderi / Rhododendron columbianum Association	S1	G1	
Hesperocyparis pygmaea - Pinus contorta ssp. bolanderi / Rhododendron columbianum FEN VARIANT			sub-association so not ranked
Pinus muricata - Notholithocarpus densiflorus Provisional Association	S3	G3	
Pinus muricata - Chrysolepis chrysophylla / Arctostaphylos nummularia Association	S2	G2	
Chrysolepis chrysophylla / Vaccinium ovatum Association			association not ranked but alliance is S2G2
Pseudotsuga menziesii - Notholithocarpus densiflorus / Rhododendron macrophyllum Association	S2	G2	
Sequoia sempervirens Alliance	S3	G2	
Sequoia sempervirens - Pinus muricata Provisional Association			not ranked (non- oligotrophic)
Sequoia sempervirens - Hesperocyparis pygmaea Provisional Association	S1	G1	provisional ranking for provisional association
Arctostaphylos nummularia Association	S2	G2	
Arctostaphylos columbiana Alliance			not ranked (non- oligotrophic)
Rubus armeniacus Semi-Natural Association	SNR	GNR	Semi-natural so not ranked
Rhododendron columbianum Alliance	S2?	G4	

VegCAMP 9/20/2018

Figure 2. List of Mendocino cypress Alliances and Associations and their rarity ranks.

*Protecting California's native flora since 1965*

2707 K Street, Suite 1 Sacramento, CA 95816-5113 • Tel: (916) 447-2677 • [www.cnps.org](http://www.cnps.org)

**Dorothy King Young Chapter P. O. Box 577, Gualala, California 95445**