

----- Forwarded message -----

From: **Charles Najarian** <REDACTED>

Date: Tue, Oct 8, 2024 at 11:19 AM

Subject: Comments re Forest Management Plan

To: <[cityclerk@ci.carmel.ca.us](mailto:cityclerk@ci.carmel.ca.us)>, Nova Romero <[nromero@ci.carmel.ca.us](mailto:nromero@ci.carmel.ca.us)>

Dear Nova,

Please distribute my email as public comments concerning the Forest Management Plan to:

-Forest and Beach Commission

-City Council

-Planning Commission

-City attorney.

Thank you,

Chuck Najarian

Forest and Beach Commissioners,

According to the CEQA Initial Study for the CBTS 6th Cycle Housing Element there are “fifty-one (51) special-status plant species” and “thirty-one (31) special-status wildlife species” that “occur in the vicinity of the housing sites.” The Initial Study presents a map of the special-status plant species and a map of the special-status wildlife species, which I have included in this email. As explained in the Initial Study, “special-status species are those listed as Endangered, Threatened, or Rare, or as a candidate for listing by the U.S. Fish and Wildlife Service and/or California Department of Fish and Wildlife, as Species of Special Concern or Fully Protected species by the California Department of Fish and Wildlife; or as Rare Plant Rank 1B or 2B species by California Native Plant Society.” Appendix D of the Housing Element provides specifics regarding each of the 82 special-status species.

The point in raising these special-status species to your attention is that you are proposing to revise the existing Forest Management Plan and those revisions could have a significant impact on the urbanized forest which provides habitat for these protected plant and animal species. To date, you have hardly if ever mentioned the California Environmental Quality Act, and when the staff finally did, it was to downplay it by claiming “it is no big deal.”

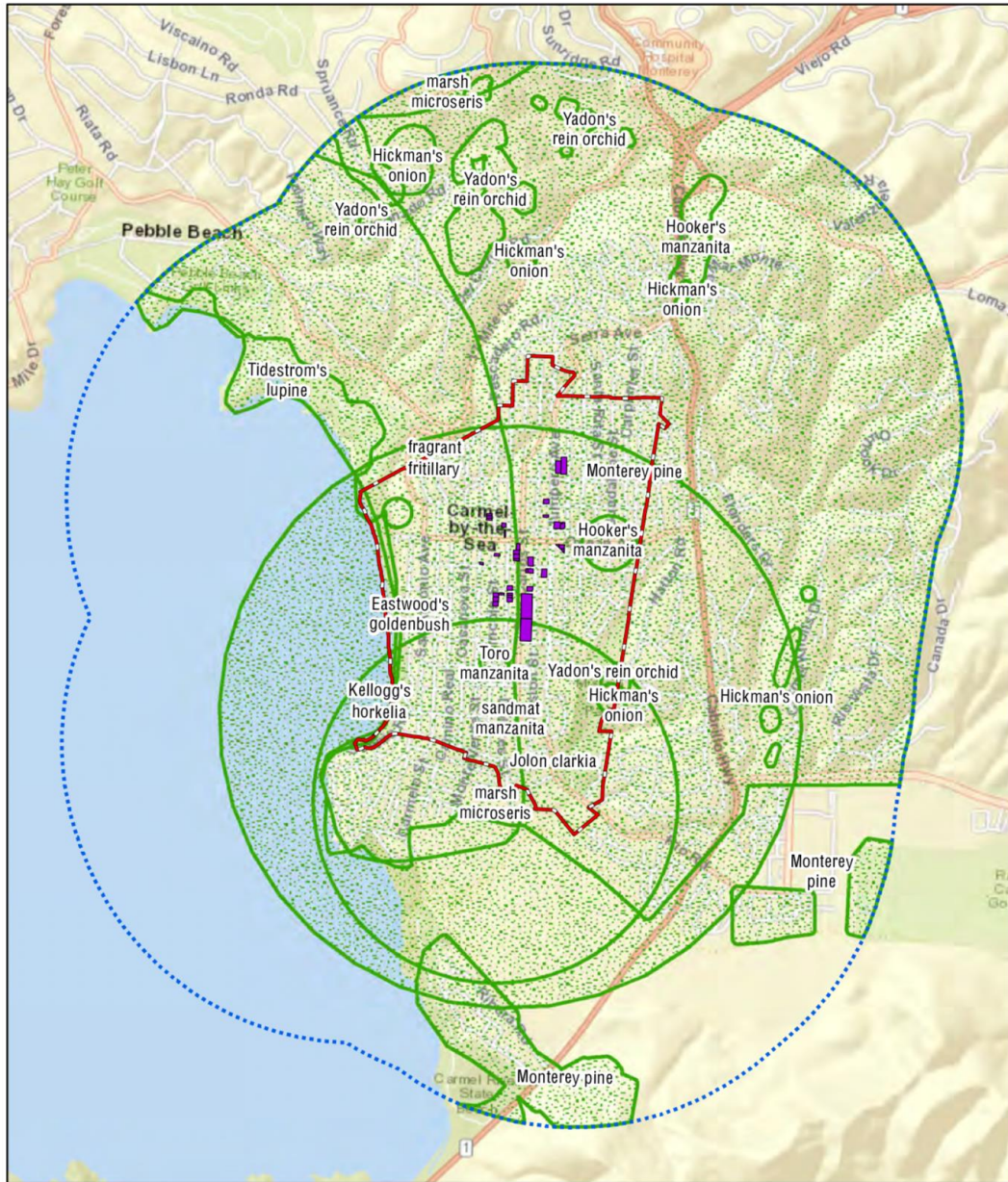
Clearly, it should be a big deal and you should have implemented it at least a year ago. Instead, you are relying on an unscientific opinion survey of a small portion of residents that has no business in what should be an analysis-driven scientific and unbiased approval process. You should have been informing yourselves (as decision-makers), as well as the residents, about the environmental ramifications of all the changes you seem to be motivated to implement regardless of potential adverse impacts to our unique urbanized forest and special-status species.

Please implement CEQA as required by the statute before doing any further work associated with the Forest Management Plan.

Sincerely,

Chuck Najarian  
Carmel Resident

Sent from my iPad



Source: ESRI 2023, CNDDDB 2023

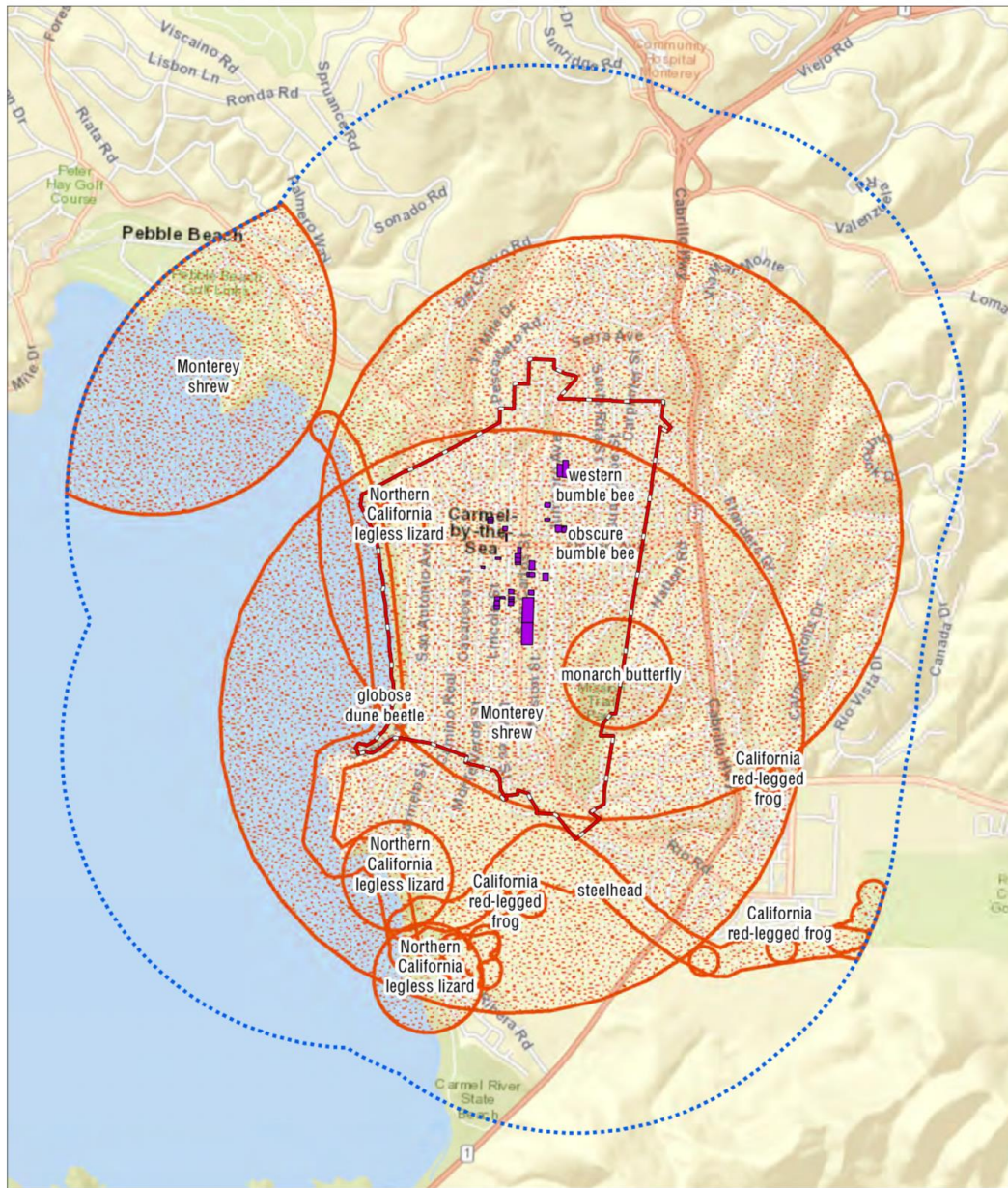


Figure 3

### Special-Status Plant Species with Potential to Occur in the Vicinity of a Housing Site



City of Carmel-by-the-Sea 6th Cycle Housing Element Update (2023-2031)  
 and Safety Element Update Initial Study



Source: ESRI 2023, CNDDDB 2023



Figure 4

### Special-Status Wildlife Species with Potential to Occur in the Vicinity of a Housing Site

City of Carmel-by-the-Sea 6th Cycle Housing Element Update (2023-2031) and Safety Element Update Initial Study

