CALIFORNIA CHAPARRAL INSTITUTE

...the voice of the chaparral

U.S. Forest Service
Attn: Kyle Kinports, Forest Planner
1980 Old Mission Dr.
Solvang, CA 93463

September 26, 2022

Re: LPNF Ecological Restoration Project

Dear Mr. Kinports:

Our family is sitting on our backyard patio in Escondido, watching a pair of Spotted Towhees enjoying the habitat we've created over the past three years. They successfully raised at least one offspring this year. We saw it scampering about looking for food with the help of its parents.

Where once was lawn is now a rich chaparral, sage scrub wonderland. It's all framed by several Refugio manzanitas (*Arctostaphylos refugioensis*) that have really taken to our place. They outgrow and out-flower any other *Arctostaphylos* species we've planted. That seems odd because they're a relatively rare species native to the coastal ridge line above Gaviota, just west of Santa Barbara. We're looking forward to this January when the white, urn-shaped blossoms will be covering the ground with chaparral snow.

I got to thinking about the temporary reprieve our lawsuit provided in 2017 to the Refugio manzanitas that were scheduled to be masticated by US Forest Service grinding machines along the Gaviota ridge. We knew at the time the reprieve would be transitory. That's the way many environmental protection lawsuits work – they merely delay.

The inevitable occurred during the 2021 Alisal Fire. Dozers ripped out and crushed many of the manzanitas we had protected. Much of the destruction was for naught as the fire had already moved quickly toward the ocean. But dozers are not easily stopped once the fire brigade arrives. Ironically, the fire appears to have started along the old ridgeline fuel break, likely in the flammable, weedy grasses that invade such disturbed places. The same situation occurred during the 2019 Cave Fire above Santa Barbara. We cited this key risk factor in our 2017 lawsuit – fuel breaks create conditions more conducive to ignitions.

And now the Refugio manzanitas that remain along the ridge face yet another threat, as do tens of thousands of acres of chaparral throughout the Los Padres National Forest, with the newly proposed LPNF *Ecological Restoration* Project; the use of Orwellian doublespeak is common in land management policy.

We had hoped this destructive approach to chaparral was a thing of the past.

Chaparral as a Natural Resource

Over the past decade we had been encouraged by the USFS's recognition of the chaparral's value, the threats the system faces, and of the need to restore native shrublands in areas that have been compromised by excessive fire and other disturbances like over-grazing.

In 2011, the new USFS Leadership Intent regarding ecological restoration for Region 5 stated,

> *There is an additional crisis taking place in our Southern California Forests as an unprecedented number of human-caused fires have increased fire frequency to the extent that fire-adapted* ***chaparral can no longer survive and is being replaced with non-native annual grasses at an alarming rate.*** *To counter these trends, forest managers will need to significantly increase the pace and scale of the Region's restoration work. Only an environmental restoration program of unprecedented scale can alter the direction of current trends.*

On June 18, 2013, during the US Forest Service's Chaparral Symposium at the headquarters of the Angeles National Forest, Martin Dumpis, the coordinator for a new Forest Service initiative focusing on the protection and restoration of chaparral, provided those of us who value Nature so much hope. Standing at the podium and speaking with his disarming midwestern accent, he said, ***"Chaparral should be seen as a natural resource, rather than a fire hazard."***

In 2021, Nicole Molinari and others examined various steps necessary to successfully restore chaparral that has been compromised by too many fires with the primary goals of **"maintaining sufficient native shrub cover and reducing the probability of future fire ignitions that would interfere with chaparral ecosystem recovery."**

Clear it Anyway

However, the sudden influx of funding for habitat clearance projects, and associated political pressures, have caused the USFS to revert back to its previous perspective of chaparral as *fuel* rather than a source of life.

As consequence, **the US Forest Service has become a fuel management agency rather than a land management agency focused on conserving natural resources.**

The step backward is deeply disheartening.

As Cal Fire has done with its statewide Vegetation Treatment Program (VTP), the USFS cites the science demonstrating that chaparral is being increasingly threatened, then proceeds to do what fuel management agencies do – clear more chaparral anyway.

How much habitat is the LNPF *Ecological Restoration* Project proposing to clear?

The Project is targeting more than a quarter million acres for "treatment," more than half of which is native shrubland when including chaparral and sage scrub habitats naturally found within forested areas, or as the USFS vilifies these rich sources of biodiversity, "ladder fuels."

Despite the overwhelming impact the Project has on chaparral, the Project's scoping letter fails to clearly explain exactly how chaparral will be *"restored"* or protected.

Instead, the scoping letter spends a significant amount of space referring to forest health, how the Los Padres conifer forests are supposedly overly dense due to past fire suppression, and how chaparral will be cleared in, around, and near forests to protect the trees that remain after the Project's logging activities.

It appears the Project's entire *ecological restoration* component for chaparral rests on the twisted notion that if enough chaparral is cleared in football-field-length wide fuel breaks on as many ridge lines as possible (most far from any community at risk), along scenic highways, in large numbers of adjoining polygons in the Santa Barbara front country, and along both sides of Piru Creek and the Santa Ynez River, that the threat of increasing fire frequencies in chaparral will be addressed.

Such an assumption has been proven incorrect time and time again. The scoping letter even acknowledges this:

> *"However, regardless of firefighting efforts, even the best fuelbreaks stand little chance of arresting large fires in extreme conditions. Fuelbreaks are not designed to stop the spread of fire, especially during periods of strong winds when fire brands can be blown across these linear features."*

The 2017 Whittier Fire and the 1990 Painted Cave Fire provide two such examples (Figs. 1 & 2).

Regardless, the scoping letter justifies the clearance of tens of thousands of acres of chaparral because *"under normal burning conditions"* such clearance should allow for successful fire suppression efforts. Or stated more accurately, **the Project will ignore the wildfires that burn the most acreage, destroy nearly all the property, and cause nearly all the fatalities**. To make matters worse, the Project will increase the chance of ignitions by creating conditions that cause the spread of highly flammable, non-native grasses across the landscape.

Imagine if the US Military or the Federal Aviation Administration took this approach – only planning for perfect battle conditions, fair weather, and fool-proof equipment, in addition to increasing risk within the environment they operate.

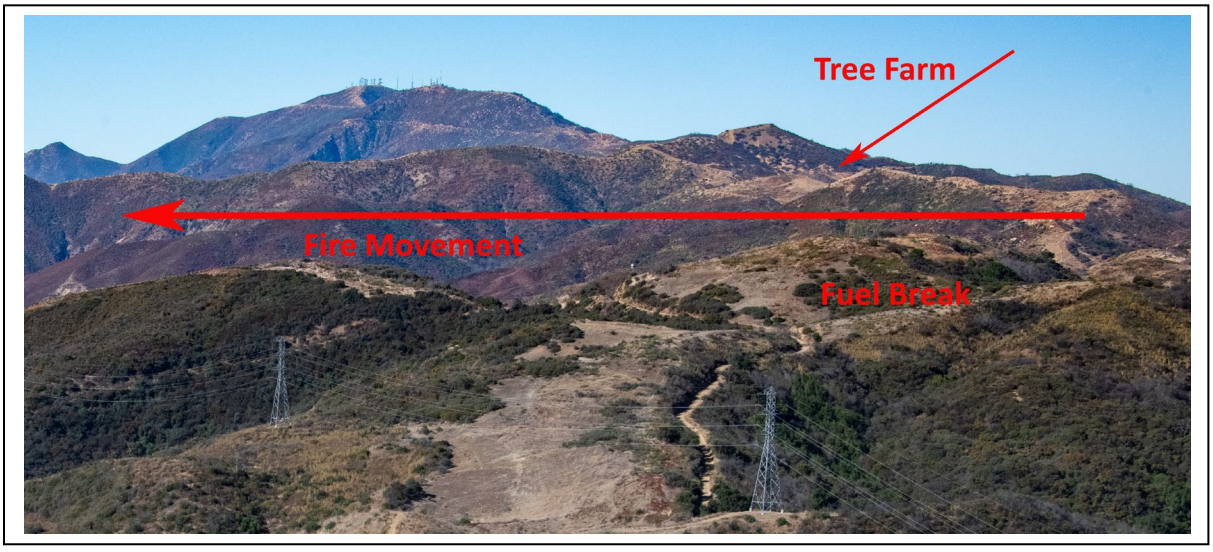


Figure 1. The Whittier Fire easily jumped the 300-foot-wide West Camino Cielo fuel break.



Figure 2. The West Camino Cielo Fuel Break before the 2017 Whittier Fire (left). Photo on the right shows the same scene two years after the fire jumped the fuel break; the masticated habitat material left on the ground was burned and flammable, non-native grasses invaded. Notice the overly dense tree farm on the left, untouched by the masticators, but burned in the fire. The USFS bias in favor of trees causes it to see chaparral as only "fuel."

Deja Vu

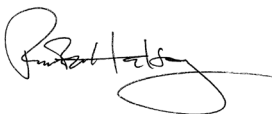
After twenty years of experience in submitting comments on dozens of USFS projects, we have come to the unfortunate conclusion that the NEPA process is broken.

Environmental Assessments and Environmental Impact Statements are written to create legally defensible documents to allow agencies to log and clear the habitat in the manner they want, not to objectively determine if a project should be rejected because it causes excessive environmental harm. Consequently, the courts provide the only realistic way to obtain relief for Nature.

Therefore, instead of repeating ourselves, we are submitting comment letters we have written regarding previous USFS habitat clearance projects that apply to the LPNF *Ecological Restoration* Project. Most of the projects we have commented on since 2005 have shown a bias in favor of forests at the expense of chaparral, have viewed chaparral primarily as a fuel source rather than an essential natural resource, and have consistently failed to properly recognize the cause of home ignition – embers, not nearby vegetation. The LPNF *Ecological Restoration* Project is no different.

It is our hope that the wealth of information our letters provide concerning native shrublands and wildfire will help the agency remember what it was beginning to understand before the current explosion in funding to clear habitat – **chaparral is not "fuel," but in fact, living habitat**.

Sincerely,



Richard W. Halsey
Director
California Chaparral Institute

Attachments:
California Chaparral Institute comment letters to the USFS



One of the old-growth, legacy Refugio manzanitas on Gaviota Ridge.



California dogface butterfly nectaring on a Refugio manzanita flowers.