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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

CALIFORNIA CHAPARRAL INSTITUTE, a California Non-Profit Corporation; ENDANGERED HABITATS LEAGUE, a California Non-Profit Corporation,

Petitioners and Plaintiffs

v.

CALIFORNIA DEPARTMENT OF FORESTRY AND FIRE PROTECTION; JOE TYLER, in his official capacity as the Director of Cal Fire; BOARD OF FORESTRY AND FIRE PROTECTION, and; DOES 1-25, inclusive

Respondents and Defendants

Case Number: 26CU036229C

PETITION FOR WRIT OF MANDAMUS; COMPLAINT FOR DECLARATORY RELIEF

I. INTRODUCTION

1. This case seeks to compel the California Department of Forestry and Fire Protection (hereinafter "Cal Fire") to comply with Section 4483 of the Public Resources Code and prevent type conversion of chaparral and coastal sage scrub habitat as a result of vegetation treatment projects approved, funded or reviewed by Cal Fire.

2. This case seeks to compel the Director of Cal Fire to immediately consult with the Board of Forestry and Fire Protection on the guidelines, standards, requirements and prohibitions that apply to section 4483 of the Public Resources Code as required by Title 14, section 1655 of the Cal. Code of Regulations.

3. This case seeks to compel the Board of Forestry to begin the rule making process to adopt regulations supplying guidelines, standards, requirements and prohibitions to the Director of Cal Fire for the implementation and administration of Section 4483 of the Public Resources Code.

II. VENUE

4. Venue is proper in San Diego County Superior Court in that Cal Fire and the Board of Forestry and Fire Protection are State agencies and the State Attorney General has an office in the City of San Diego. (Code Civ. Proc. § 401.) Venue is also proper in San Diego County Superior Court against Respondent and Defendant Joe Tyler, the Director of Cal Fire, in that San Diego County possesses a substantial amount of chaparral and coastal sage scrub, and are threatened by the actions or failure to act of Joe Tyler. (Code Civ. Proc. § 393.)

III. PARTIES

5. Petitioner and Plaintiff California Chaparral Institute is a non-profit corporation duly registered in the State of California. California Chaparral Institute's mission is the protection of the State's chaparral and coastal sage scrub habitat and the multitude of species that make shrublands their home. California Chaparral Institute has

standing in that the actions or inactions of Respondents and each of them have been directly harming chaparral and coastal sage scrub by permitting and/or performing vegetation treatments that are likely to cause type conversion of shrub habitat to flammable invasive grasses and forbs.

6. Petitioner and Plaintiff Endangered Habitat League is a non-profit corporation duly registered in the State of California. Endangered Habitats League (EHL) is a regional conservation group dedicated to ecosystem protection and sustainable land use. It was founded in 1991 to protect the endangered species inhabiting Southern California shrublands. Serving on advisory committees, EHL has collaborated with local, state, and federal governments to put in place comprehensive reserve systems for chaparral and coastal sage scrub. Its members enjoy these natural areas. EHL advocates for science-based fire management in order to preserve the biological values of shrublands and to protect human communities from wildfire.

7. Respondent and Defendant California Department of Forestry and Fire Protection (Cal Fire) is a state agency with the jurisdiction to approve or deny vegetation treatment projects, including prescribed burns in chaparral and coastal sage scrub habitat. (Pub. Res. Code § 4475; Pub. Res. Code 4483.) It is also considered a responsible agency under CEQA with a duty to review, comment and consult with local agencies and state agencies. (Pub. Res. Code §§ 21104, 21153.)

8. California Department of Forestry and Fire Protection is commonly referred to as Cal Fire or the "Department." (Pub. Res. Code § 700; 14 Cal. Code of Regs 1120.1)

9. Respondent and Defendant Joe Tyler is the Director and Fire Chief of Cal Fire and is responsible for ensuring that statutes, rules and regulations applicable to all fire districts within Cal Fire are complied with, including the requirements of Section 4483. (Pub. Res. Code § 4475; Pub. Res. Code § 4483.)

10. Chief Joe Tyler had a mandatory duty to consult with the Board of Forestry in how to properly interpret and implement Public Resources Code section 4483.

11. Respondent and Defendant Board of Forestry and Fire Protection is a state board that determines the general policies, rules and regulations of Cal Fire. (Pub. Res. Code § 740.) It also has a duty to consult and promulgate rules for the implementation Section 4483 upon request by the Director of Cal Fire.

IV. CHAPARRAL AND COASTAL SAGE SCRUB

12. Chaparral is a biodiverse, shrub-dominated plant community shaped by a Mediterranean-type climate, a complex mixture of relatively nutrient poor soils, and large, infrequent, high-intensity fires. At maturity, chaparral typically is a dense, nearly impenetrable shrubland with greater than 80 percent absolute cover. Thus, California shrubland ecosystems generally develop closed canopies that shade out most understory species. There may be sparse populations of a few annual and herbaceous perennial species, but these populations fluctuate with annual precipitation. Coastal Sage Scrub (CSS) is a similar habitat but is known to have a somewhat more open canopy.

13. While healthy, mature chaparral may appear to be merely an amorphous green, dense carpet covering hundreds to tens of thousands of hectares, there is a remarkable amount of biodiversity in both plant and wildlife in chaparral and CSS.

14. Chaparral and coastal sage scrub habitat are some of the most productive habitats in California. "Of 712 regularly occurring mammals, birds, amphibians, and reptiles inventoried in CWHR, 388 occur at some point in their life cycle in chaparral or coastal sage scrub habitats; and 374 of these (114 mammals, 172 birds, 30 amphibians, and 58 reptiles) are native and 141 of these are special-status species with 70 of them being officially listed under ESA or CESA." (2019 Cal VTP at 3.6-21 to 22).)

15. Type conversion in shrubland is generally defined as a change from a vegetation type dominated by native shrub species to a vegetation type characterized predominantly by non-native, weedy herbaceous cover and invasive grasses.

16. While healthy, mature chaparral and coastal sage scrub can recover relatively quickly from infrequent, high-intensity fire, one of the primary drivers of type conversion is

a shortened fire interval. A fire return interval is defined as the typical number of years that a habitat naturally experiences fire in the California. For example, non-native grasslands may have a fire return interval of every 2-3 years due to human-caused ignitions. Many of the shrub habitats have a natural fire return interval ranging from 30 years to more than 100 years. The natural fire return interval is determined by the likelihood of lightning strikes. Coastal sage scrub and chaparral have been experiencing fire too often due to human sources of ignition and suffering from type conversion to grasslands.

17. This negative impact was recognized by the State Legislature, which found:

> It is the intent of the Legislature that additional consideration be provided for chaparral and coastal sage scrub plant communities that are being increasingly threatened by fire frequency in excess of their natural fire return patterns due to climate change and human-caused fires.

(Pub. Res. Code § 4483(b)(1).)

18. Thus, the Legislature mandated that the "department" (Cal Fire) make a finding that vegetation treatment projects will not cause type conversion. Section 4483, subd (b)(2) states:

> Prescribed burning, mastication, herbicide application, mechanical thinning, or other vegetative treatments of chaparral or sage scrub shall occur only if the department finds that the activity will not cause "type conversion" away from the chaparral and coastal sage scrub currently on site.

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19. Petitioners and Plaintiffs allege that the Legislature intended to impose a mandatory requirement on Cal Fire to make an express written finding, supported by substantial evidence, that a vegetation treatment project approved or reviewed by Cal Fire will not cause type conversion of chaparral and coastal sage scrub.

20. Petitioners and Plaintiffs allege that Cal Fire has failed to make any express findings required by law and/or to support their findings based on substantial evidence pursuant to Section 4483.

21. Petitioners and Plaintiffs allege that, alternatively, if a written finding is not required, but may be implied, that Cal Fire's implied findings are not supported by substantial evidence that the vegetation treatment project will not cause type conversion.

22. Petitioners and Plaintiffs allege, upon information and belief, that the Director failed to comply with his mandatory duty under the Title 14, section 1655 of the California Code of Regulations to immediately consult with the Board of the Forestry and Fire Protection for direction on the application of Section 4483 of the Public Resources Code. Among other requirements, the Director failed to consult with the Board of Forestry and Fire Protection on whether Section 4483 required a written finding, the standards for determining whether a project would cause type conversion, and what actions are prohibited.

23. It is alleged on information and belief that since 2019, there are numerous projects approved or reviewed by Cal Fire that violate the average Fire Return Interval of chaparral and coastal sage scrub. In fact, numerous projects seek to treat chaparral and/or coastal sage scrub less than 10 years after the area previously experienced a wildfire, and on a rolling basis every five to ten years. Such actions are very likely to cause type conversion of native shrubs to invasive annual grasses and forbs.

24. Section 4483 requires a finding that the project will not cause type conversion of chaparral and coastal sage scrub.

V. PRELIMINARY ALLEGATIONS

25. California Chaparral Institute and Endangered Habitats League have standing in that the protection of chaparral and coastal sage scrub habitat is central to their missions.

26. The proper enforcement of Public Resources Code section 4483 is critical to the protection of chaparral and coastal sage scrub from type conversion caused by vegetation treatment projects.

27. Respondents' have a mandatory duty to follow the proper procedures necessary for the interpretation, implementation, and administration of Section 4483 of the Public Resources Code.

28. The failure of respondents, and each of them, to properly implement Public Resources Code section 4483 has resulted in a pattern and practice of Cal Fire allowing vegetation treatment projects to be conducted in a manner that is highly likely to cause type conversion of chaparral and coastal sage scrub habitat resulting in the proliferation of highly flammable, non-native invasive grasses and forbs, and the substantial degradation of chaparral and coastal sage scrub in contravention to Section 4483.

29. Causing respondents to follow their own procedures to properly interpret, implement, administer and enforce Section 4483 will benefit the entire State of California by protecting the environment and reducing fire risk caused by the proliferation of highly flammable, non-native invasive grasses and forbs.

30. Both a preliminary and permanent injunction are necessary to prevent further vegetation treatments in chaparral and coastal sage scrub until the Board of Forestry adopts regulations properly implementing section 4483.

31. Failure to grant injunctive relief will cause irreparable harm to the interest Petitioner seeks to protect, and may result in the extirpation of chaparral and coastal sage scrub in certain areas of the State.

32. Petitioners and Plaintiffs are entitled to attorney's fees and costs for bring this suit on behalf of the public pursuant to Code of Civil Procedure section 1021.5 in that successful prosecution of this case will:

a. a significant benefit will be conferred to the public;

b. the necessity and financial burden of private enforcement make the award appropriate;

c. Attorneys' fees should not be paid out of any recovery, if any.

FIRST CAUSE OF ACTION
(Petition for Writ of Mandamus)
(Cal. Chaparral Inst. and Endangered Habitats League v. Cal Fire and Joe Tyler)

33. Petitioners re-allege and incorporate all previous paragraphs as if fully stated herein

34. Section 4483 requires Cal Fire to make a finding that vegetation treatments in chaparral and coastal sage scrub habitat will not cause type conversion for all vegetation treatment projects whether proposed by Cal Fire or third parties.

35. Section 4483 does not include any guidelines, standards, requirements and prohibitions for evaluating whether a vegetation treatment may cause type conversion and therefore is prohibited.

36. Section 4483 fails to expressly state whether the finding required under Section 4483 must be in writing.

37. It is alleged on information and belief that Cal Fire has not been making any findings pursuant to section 4483 on the vast majority of vegetation treatment projects.

38. The Cal VTP, approved in 2019, expressly declined to define type conversion or set any standards for type conversion of chaparral and pursuant to section 4483.

39. Pursuant to Title 14, section 1655 of the Cal. Code of Regulations, Cal Fire and/or Respondent Chief Joe Tyler was required to consult with the Board of Forestry and Fire Protection on the definition and requirements for evaluating type conversion of chaparral and coastal sage scrub.

40. Pursuant to Title 14, section 1655 of the Cal. Code of Regulations, Cal Fire and/or Respondent Chief Joe Tyler was required to consult with the Board of Forestry as to whether it was required to make a written finding, based on substantial evidence, that the vegetation treatment project will not cause type conversion.

41. Cal Fire's and Chief Joe Tyler's requirement to consult with the Board of Forestry and guidelines, standards, requirements and prohibitions for evaluating whether a vegetation treatment may cause type conversion is a mandatory duty required by law.

42. Petitioner has no other remedy in that the damage caused by vegetation treatment projects in chaparral and coastal sage scrub causes irreparable harm to the environment, and monetary damages are neither available nor will make petitioner whole.

43. Preliminary injunctive relief should issue prohibiting vegetation treatment projects in chaparral and coastal sage scrub habitats until respondents Cal Fire and Joe Tyler

consult with the Board of Forestry and the Board of Forestry issues guidelines, standards, requirements and prohibitions for the protection of chaparral and coastal sage scrub pursuant to Section 4483 of the Public Resources Code.

44. Pursuant to Code of Civil Procedure section 1085, the court should issue a writ of mandamus ordering Cal Fire and Joe Tyler to consult with the Board of Forestry and Fire Protection on the proper application and implementation of Section 4483 of the Public Resources Code.

SECOND CAUSE OF ACTION
PETITION FOR WRIT OF MANDAMUS
(Cal. Chaparral Inst. and Endangered Habitats League v. Board of Forestry and Fire Protection)

45. Petitioners re-allege and incorporate all previous paragraphs as if fully set forth herein.

46. Pursuant to Public Resources Code § 740, the Board of Forestry and Fire Protection "shall represent the state's interest in the acquisition and management of state forests as provided by law and in federal land matters pertaining to forestry, and the protection of the state's interests in forest resources on private lands, and shall determine, establish, and maintain an adequate forest policy. General policies for guidance of the department shall be determined by the board."

47. It is alleged on information and belief that the Board of Forestry and Fire Protection is required to "issues guidelines, standards, requirements and prohibitions" for any laws impacting state forests, including chaparral and coastal sage scrub.

48. Pursuant to Cal. Code of Regulations, Title 14, Section 1655, the rules and regulations of the Board of Forestry and Fire Protection shall contain the policies for guidance of the Director "Such rules shall be interpreted to give recognition to all applicable state statutes and to harmonize questions of potential policy conflicts."

49. In the 2019 Cal VTP, the Board of Forestry expressly failed to define or set standards for type conversion of chaparral and coastal sage scrub for the purposes of Public Resources Code section 4483, and instead improperly delegated to the project proponent,

which may be Cal Fire or a third party, the duty to determine the criteria and standards for avoiding type conversion.

50. It is alleged on information and belief that the Board of Forestry continues to lack any guidelines, standards, requirements and prohibitions in the Board policies that provide guidance on the interpretation of Public Resources section 4483.

51. It is alleged on information and belief that the Board of Forestry violated the California Code of Regulations and continues to violate the California Code of Regulations by not developing and imposing "guidelines, standards, requirements and prohibitions" that interpret and are consistent with Public Resources Code section 4483.

52. It is alleged on information and belief that because the Board of Forestry has failed to appropriately adopt regulations providing definitions, guidelines, standards, requirements and prohibitions consistent with Public Resources Code section 4483, Cal Fire has either failed to make the findings required by law, and/or failed to support its findings with substantial evidence.

53. The Board of Forestry has a mandatory duty to adopt regulations for the implementation and administration of Section 4483 and to provide guidance to the Director of Cal Fire.

54. A writ of mandamus should issue compelling the Board of Forestry to begin the process of adopting regulations, consistent with an appropriate public process, for the implementation and administration of Section 4483 and to provide guidance to the Director of Cal Fire.

55. The continued approval of vegetation treatment projects in chaparral and coastal sage scrub does irreparable damage to Petitioners in that conservation of chaparral and coastal sage scrub is central to the interest that Petitioners seek to protect and continued vegetation treatment projects may cause irreversible type conversion of chaparral and coastal sage scrub into invasive and highly flammable annual grasses and forbs.

56. Petitioners have no plain or speedy relief under the law, and monetary damages are neither available nor would make petitioners whole.

57. Petitioners are entitled to a preliminary and permanent injunction prohibiting Cal Fire from approving any vegetation treatment projects that impact chaparral and coastal sage scrub until the Board of Forestry adopts regulations for the implementation and administration of Public Resources Code section 4483 and provides guidance to the Director of Cal Fire.

THIRD CAUSE OF ACTION

DECLARATORY RELIEF BASED ON PATTERN AND PRACTICE (Cal. Chaparral Inst. and Endangered Habitats League v. Cal Fire and Joe Tyler)

58. Petitioners re-allege incorporate all previous paragraphs as if fully set forth herein.

59. In December of 2019, the Board of Forestry approved the State-wide California Vegetation Treatment Plan (Cal VTP) and certified the programmatic environmental impact report.

60. The Cal VTP properly found that a "[s]hortened fire return interval has been identified as a primary driver of type conversion from chaparral and coastal sage scrub vegetation types to vegetation types dominated by nonnative herbaceous vegetation in Southern California." Such statement is supported by multiple scientific studies.

61. The Board of Forestry imposed Special Project Requirements that the Cal VTP claimed would mitigate the impacts of type conversion in chaparral and coastal sage scrub. Among other requirements, SPR BIO-5 required "During the reconnaissance-level survey required in SPR BIO-1, a qualified RPF or biologist will identify chaparral and coastal sage scrub vegetation to the alliance level and determine the condition class and fire return interval departure of the chaparral and/or coastal sage scrub present in each treatment area."

62. SPR BIO-5 further required, "Ecological restoration treatments will not be implemented in vegetation types that are within their natural fire return interval (i.e., time since last burn is less than the average time listed as the fire return interval range in Table

3.6-1) unless the project proponent demonstrates with substantial evidence that the habitat function of chaparral and coastal sage scrub would be improved."

63. SPR BIO-5 included a number of mitigation measures and requirements, including maintaining at least 35% of the shrubs (burning or removing 65% of the shrubs). Each of the primary requirements could be modified if the habitat function could somehow be maintained for animals.

64. In 2020, California Chaparral Institute and Endangered Habitats League filed a petition for writ mandamus seeking to invalidate the Cal VTP PEIR in San Diego Superior Court. (SD Sup. Court Case No. 37-2020-00005203-CU-TT-CTL.)

65. Preliminary Injunctive relief was not sought, and therefore Cal Fire could continue to approve vegetation treatment projects.

66. Petitioners' writ was denied in November of 2023, but such denial was overturned on appeal.

67. In May of 2025, the Court of Appeal overturned the superior court's denial of the writ ordering the trial court to issue a writ of mandamus and enter judgment in favor of petitioners. Judgment was entered by San Diego Superior Court on November 14, 2025 and a writ issued that limited the types of projects that could potentially be approved in chaparral or coastal sage scrub.

68. From November of 2019 to November 14, 2025, Cal Fire could approve vegetation treatment projects by tiering off and complying with the Cal VTP including SPR BIO-5.

69. It is further alleged on information and belief that Cal Fire, to the extent that it was not the lead agency, was a responsible agency mandated to consult with, review, comment on and reject VTP projects that may cause type conversion of chaparral and coastal sage scrub.

70. A review of the numerous VTP projects approved or reviewed by Cal Fire from November 2019 to present demonstrates a pattern and practice of ignoring even the

restrictions of SPR BIO-5, such as implementing vegetation treatment projects in chaparral and coastal sage scrub habitat that has not had a chance to recover from previous fires.

71. On or about May 16, 2023, Ventura County Fire District approved The Haley Vegetation Treatment Project in Ventura County. Such project proposes to treat chaparral habitat that was burned in the 2017 Thomas fire. It also proposes to treat approximate 1/3 of the chaparral and coastal sage scrub habitat on a 3-year rotating basis. Thus, chaparral and coastal sage scrub which has not had a chance to fully recover from a wildfire, will be treated within 7 years and then on an ongoing base every six years. This is well below the average fire return interval and completely inconsistent with the Cal VTP. The project is proposing to remove approximately 65% of the shrubs. It is alleged on information and belief that Cal Fire approved the project without modification or express findings under Section 4483. In the alternative, it is alleged on information and belief that Cal Fire allowed the project to proceed without reviewing the project, despite the necessity of discretionary approval under section 4483 and comment under Public Resources Code sections 21104 and/or 21153.

72. On or about October 1, 2024, the Ventura County Fire Protection District approved the Adams Canyon East Winds Project, which proposes to treat chaparral as wildlife urban interface, despite the area being approximately 2 miles from the town of Santa Paula (beyond what would be considered WUI). The project proposes to treat approximately 1070 acres of coastal sage scrub and 12 acres of mixed chaparral habitat and remove approximately 70% of the "live material". The area proposed to be treated was also burned in the 2017 Thomas fire. The entire project area would be treated over a period of 10 years. It is alleged on information and belief that Cal Fire approved the project without modification and without making express findings pursuant to section 4483. In the alternative, it is alleged on information and belief that Cal Fire allowed the project to proceed without reviewing the project, despite the necessity of discretionary approval under section 4483 and comment under Public Resources Code sections 21104 and/or 21153.

73. On or about May 28, 2025, Nevada County approved the "South Yuba Rim Hazardous Fuels Reduction Project." The project proposes to treat approximately 814.8 acres of chaparral. It describes 368.6 acres of chaparral being in the WUI, despite maps showing the stands as being five miles or more from houses or significant development. Importantly, portions of the project area burned in the 2022 Rices Fire, and, "Native Shrubs have begun to re-establish." The project description continues that, "This is a priority treatment location where ecological restoration and fuel break treatment types would be implemented." More alarming is the wide-spread invasion of Scotch broom, an invasive shrub from Europe, in the project area. It is alleged on information and belief that Cal Fire approved the project without modification and without making express findings pursuant to section 4483. In the alternative, it is alleged on information and belief that Cal Fire allowed the project to proceed without reviewing the project, despite the necessity of discretionary approval under section 4483 and comment under Public Resources Code sections 21104 and/or 21153.

74. On March 5, 2026, California Department of Fish and Wildlife approved the Tehama Wildlife Area Vegetation Treatment Project. It is alleged on information and belief that the Tehama Wildlife Area was burned in the 2024 Park fire. Despite the inconsistencies with the Cal VTP and despite the fact that the Cal VTP PEIR has been struck down based on legally inadequate environmental review, it is alleged on information and belief that Cal Fire approved the project permits without modification and without making express findings pursuant to section 4483. In the alternative, it is alleged on information and belief that Cal Fire allowed the project to proceed without reviewing the project, despite the necessity of discretionary approval under section 4483 and comment under Public Resources Code sections 21104 and/or 21153.

75. On June 25, 2025, Los Angeles County Fire Department approved the "Foothill Fuel Reduction Project." The project proposes to treat 482.6 acres of slopes and canyons covered with predominantly chaparral, but also includes coastal sage scrub. The project proposes to retain approximately 1/3 of the shrubs in a mosaic. The project area

burned in 2009 Station Fire, and therefore the chaparral and coastal sage scrub is below the average fire return interval. The project is proposing to treat the chaparral and coastal sage scrub every five to ten years, which will guarantee type conversion. Despite the inconsistencies with the Cal VTP and despite the fact that the Cal VTP PEIR has been struck down based on legally inadequate environmental review, it is alleged on information and belief that Cal Fire approved the project permits and/or funding the project without modification and without making express findings pursuant to section 4483. In the alternative, it is alleged on information and belief that Cal Fire allowed the project to proceed without reviewing the project, despite the necessity of discretionary approval under section 4483 and comment under Public Resources Code sections 21104 and/or 21153.

76. Cal Fire has a duty to deny a vegetation treatment project unless the project shall not cause type conversion of chaparral and/or coastal sage scrub, regardless of whether it is proposed by Cal Fire or a third party.

77. Based on the science, vegetation treatment projects are very likely to cause type conversion of chaparral and coastal sage scrub habitat.

78. It is alleged, on information and belief, that Cal Fire has failed to review, comment and approve or deny projects proposed by third party, non-Cal Fire related entities, and has failed to make express findings required by Section 4483 of the Public Resources Code.

79. It is alleged on information and belief that Cal Fire approved the above projects without alteration and without making any express findings pursuant to Section 4483.

80. Cal Fire lacks substantial evidence that the mitigation measures in SPR BIO-5 will avoid type conversion.

81. Cal Fire has a pattern and practice of violating Section 4483 in that it fails to support with substantial even an implied finding that the VTP projects, as designed, will avoid type conversion.

82. Cal Fire, to the extent that it makes any finding that the vegetation treatment projects comply with Section 4483, fails to support its finding with substantial evidence.

83. It is alleged on information and belief that Cal Fire disputes that it has a pattern and practice of violating Section 4483 of the Public Resources Code and therefore, a current controversy exists between the parties.

84. It is alleged on information and belief that Cal Fire dispute that it has a pattern of practice of failing to review projects proposed by third parties, despite being a responsible agency under CEQA and therefore, a current controversy exists between the parties.

85. A judicial declaration concerning the pattern and practice of Cal Fire will prevent a multiplicity of lawsuits in the future and potentially inconsistent rulings on the same issues.

86. Plaintiffs have no remedy at law in that monetary remedies would not provide complete relief.

87. Plaintiffs seek a judicial declaration that Cal Fire has a pattern and practice of violating Section 4483.

88. Plaintiffs seek a judicial declaration that Cal Fire has a pattern and practice of violating its duty under CEQA to review and comment on vegetation treatment projects proposed by third parties.

89. Plaintiffs seek injunctive relief prohibiting Cal Fire from approving any vegetation treatment projects impacting chaparral or coastal sage scrub habitat without first making a written finding, based on substantial evidence, that the project will not cause type conversion.

PRAYER FOR RELIEF

Wherefore Petitioners pray for the Court to grant the following relief:

1. Writ of mandamus compelling Cal Fire and Joe Tyler to consult with the Board of Forestry and Fire Protection regarding the guidelines, standards, requirements and prohibitions for the interpretation, implementation and administration of Section 4483 of the Public Resources Code;

2. Writ of mandamus compelling the Board of Forestry and Fire Protection to engage in its rulemaking process and adopt regulations for the interpretation, implementation and administration of Section 4483 of the Public Resources Code;

3. For a judicial declaration that Cal Fire has a pattern and practice of violating Sections 4483 & 21000 et. seq. of the Public Resources Code;

4. For a preliminary injunctive relief and permanent injunctive relief prohibiting Cal Fire, Joe Tyler, or any of its subdivisions, from approving vegetation treatment projects in chaparral and coastal sage scrub habitats until the Board of Forestry properly adopts regulations for the interpretation, implementation and administration of Section 4483 of the Public Resources Code;

5. For attorney's fees and costs pursuant to Code of Civil Procedure section 1021.5

6. For costs of suit incurred herein, and;

7. For such further and additional relief that the court may find necessary in the interest of justice and equity.

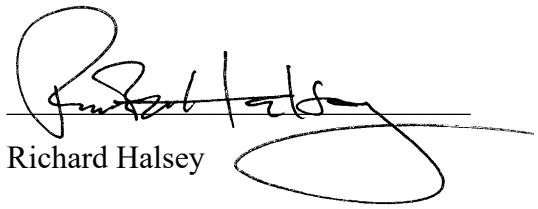
DATE: July 1, 2026



Todd T. Cardiff, Esq.
Attorney for Petitioners and Plaintiffs
California Chaparral Institute
Endangered Habitats League

VERIFICATION

I am an officer and board member of the California Chaparral Institute and authorized to make statements on behalf of such entity. I have reviewed the above allegations and know the contents thereof. I state under penalty of perjury that such allegations are true and correct, except for statements based on information and belief, and as to such statements I belief them to be true. Executed this 1st day of July, 2026, in the County of San Diego.



Richard Halsey

VERIFICATION

I am the executive director of the Endangered Habitats League and authorized to make statements on behalf of such entity. I have reviewed the above allegations and know the contents thereof. I state under penalty of perjury that such allegations are true and correct, except for statements based on information and belief, and as to such statements I belief them to be true. Executed this 1st day of July, 2026, in the County of Los Angeles.



Dan Silver