CALIFORNIA CHAPARRAL INSTITUTE

...the voice of the chaparral

California Coastal Commission January 30, 2026

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RE: Habitat Clearance Project - Impending Development Nos. SMC-NOID-0007-25 and VTP-NOID-0008-25 (Coastal Santa Cruz Mountains State Parks Forest Health Initiative)

Opposition

Dear Commissioners,

The staff report for the current NOID relating to the Coastal Santa Cruz Mountains State Parks Forest Health Initiative repeats the same misconception used to justify logging and other habitat clearance operations in the July 2021, San Mateo County and Santa Cruz County Public Works Plans.

The current report states,

"The ecological restoration component of the project seeks to address the legacy of fire suppression efforts, which persist even following the catastrophic CZU fire."

Therefore, what we wrote to you in 2021 applies to the current NOID for the Santa Cruz Mountains.

"The California coastal zone has one of the lowest lightning frequencies in North America, the natural source of ignition. While yes, the reports are correct in that coastal habitats have evolved with fire, these systems could not have survived the higher fire frequencies the reports are implying existed in the past. **Large, high-intensity, infrequent wildfires are the normal condition for the coastal zone in question."**

We have attached our 2021 comment letter for the record as it describes the same conditions and environmental impacts that apply to the current NOID.

Unfortunately, the Commission ignored the science in 2021 and approved the Plans. We are hoping the Commission will not make the same mistake this time, not only for the preservation of fragile, post-fire successional environments, but also to align with the requirements of the Appellate Court ruling in our lawsuit against the Board of Forestry's

Vegetation Treatment Program (VTP) which this project is tiered.

There were significant stands of chaparral throughout the target areas of the current NOID prior to the 2020 CZU Fire. As per the court ordered writ,

"Ecological restoration treatments of chaparral and/or chaparral may only consist of removal of flammable, non-native vegetation."

And for clarification per the writ,

"A stand of chaparral or coastal sage scrub is defined as a spatially continuous unit of shrub vegetation composed of chaparral and/or coastal sage scrub alliances. A chaparral and/or coastal sage scrub state may be surrounded by forest, grassland, or wooded vegetation."

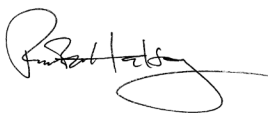
And yet, the staff report indicates that,

"Ecological restoration activities would involve…Prescribed fire will be used in grass and shrub fuel types to maintain current species assemblages and prevent ongoing type conversion to less fire-tolerant communities."

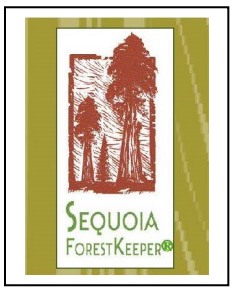
This is a direct violation of the Appellate Court ruling, requiring significant changes in the staff report and the NOID's activities to make it abundantly clear that mastication, prescribed burning, and any other clearance action shall not be taken in areas were stands of chaparral and/or sage scrub existed prior to the 2020 CZU Fire.

As we wrote in our 2021 comment letter, we urge the Commission to deny or at least postpone any decision on the current NOID. The actions described within are based on misconceptions about fire ecology and ignore the best available science as described in our attached 2021 letter.

Sincerely,



Richard Halsey



July 4, 2021

California Coastal Commission

Re: Opposed to San Mateo County and Santa Cruz County Public Works Plans, July 2021 – Thursday Agenda Items Th16a, Th19a

Dear Commissioners and Staff,

We are urging you to deny certifying, or at least delay certifying, both the San Mateo County (Th16a) and Santa Cruz County (Th19a) Forest Health and Fire Resilience Public Works Plans (PWP).

We are asking for this delay because both PWPs, if approved, will likely lead to significant environmental harm to native habitats along the coastal zone.

The Commission needs more time to hear from the scientific and environmental communities in order to properly assess the negative environmental impacts of these PWPs and the incorrect assumptions contained within the associated staff reports.

We greatly respect the staff's work on these items, but there are some fundamental errors in the reports that may have influenced the decision-making process. These errors are not of the staff's making, but rather erroneous assumptions and scientifically unsound statements that likely originated from various state departments, especially Cal Fire, concerning fire ecology and wildfire safety.

Specifically, both reports for the PWPs are based on the following errors:

1. Mischaracterization of coastal zone habitats.

2. Mischaracterization of fire suppression impacts.

3. Assuming the CalVTP will provide adequate mitigation measures to prevent the destruction of native habitat.

4. Assuming that clearance of habitat is the answer to community fire safety.

Mischaracterization of habitat and fire suppression

The justification for approving both PWPs is based primarily on a scientifically incorrect claim. Specifically,

> *"For the last century, fire suppression, and more recently, climate change, have resulted in unhealthy forests that set the stage for disease, pest infestations, and larger and more intense fires than would naturally occur in the absence of human interventions. Fire suppression has resulted in many forests characterized by dense overgrowth including too many trees and an unnaturally thick and impenetrable understory."*

First, much of the natural landscape being targeted by both PWPs is **characterized by native shrublands, such as chaparral and coastal sage scrub, and non-native grassland, not mixed-conifer forests** from which the above characterization was derived.

Secondly, **while the above characterization may be applicable to some forests that have been severely damaged by prior logging activities in the western Sierra Nevada, it is completely false for the coastal zone for both forested and non-forested plant communities**. The science is very clear on this - the natural fire return interval of the coastal zone is extremely long, on the order of a century or more. This is much longer than the era of modern fire suppression.

Unfortunately, due to the over generalization of fire ecology by both government agencies and the press, California wildfires are seen solely through the lens of mixed-conifer forest ecosystems when in fact the majority of the state's most devastating wildfires (lives lost, homes destroyed) have had little to do with such forests. As a consequence, forest management principles and assumptions designed for timber production (not the preservation of ecologically healthy native habitats) are misapplied to habitats where conifers either don't exist or represent a small percentage of the targeted landscape.

The California coastal zone has one of the lowest lightning frequencies in North America, the natural source of ignition. While yes, the reports are correct in that coastal habitats have evolved with fire, these systems could not have survived the higher fire frequencies the reports are implying existed in the past. **Large, high-intensity, infrequent wildfires are the normal condition for the coastal zone in question.**

Therefore, despite what is popularly assumed, the 2020 CZU Lightning Complex Fire was an expected, natural event. It repeats the historical pattern of large, high-intensity wildfires in the region which includes the 178,000-acre Marble Cone Fire in 1977 and an unnamed 150,000-acre fire that burned the same area in 1906. Other large fires in the region have been recorded even earlier.

The large fires that burned in 2020, having mostly been ignited by lightning under a record-breaking heatwave, are an inevitable component of our unique landscapes in California. **No amount of native vegetation management could have altered the course of these events**, because the overriding factor has been weather (though the presence of non-native grasses has been important as well).

The CZU Lightning Complex Fire in Big Basin largely self-extinguished due to an increase in humidity. And these particular redwood forests in which the fire burned naturally have a mean fire interval of approximately 135 years. The last fire in a large portion of this area was in 1904 – so the fire-free period has actually been well within the normal range.

Why is this all of this important? Because both reports concerning the two PWPs support habitat clearance projects based on the false claim that coastal zone ecosystems are unnaturally clogged with dense vegetation due to incorrect assumptions about fire suppression impacts and therefore need ecological restoration. While prescribed burning in some forest settings can be ecologically beneficial, the one-size-fits-all approach of the CalVTP and the PWPs will likely lead to the inappropriate use of fire and other habitat clearance techniques, leading to ecological damage.

Equally troubling is the mischaracterization of native habitat as if it's some kind of dangerous growth that must be checked, rather than something to value. For example, the reports say,

> *"Recent wildfires have demonstrated that **if vegetation is allowed to grow unchecked**, it becomes a hazard not only for an individual property, but for the neighboring properties, surrounding community, and adjacent natural areas."*

Native coastal habitats are vibrant sources of life that support the state's priceless biodiversity. Habitat is not *fuel* – viewing it as such only desensitizes us to the ecological loss that occurs when herbicides, masticators, bulldozers, and chainsaws are used to turn wild habitat into managed gardens.

Dense, impenetrable stands of native shrubs are the natural condition for shrublands like chaparral and sage scrub. Understory shrubbery and dead wood in forests create valuable habitat for native animals – this is especially true with fire return intervals of a century or more like those of the redwood-Doug fir forests along the coastal zone.

Contrary to what is continually reported in the news media, post-fire shrubland and forest environments are rich, vibrant ecosystems. They are not destroyed landscapes. The problem we face is impatience. Yes, climate change is increasing the flammability of California. But the answer is not to clear the natural environment – the solution favored by Cal Fire.

The solution to reducing fire risk to human communities is to make those communities fire safe themselves by proper planning, retrofits, and vegetation

management directly around vulnerable structures, not by converting biodiverse wildlands into unnatural, park-like landscapes.

The CalVTP is environmentally destructive

The reports claim that the CalVTP programmatic EIR,

> *"...provides a comprehensive framework for implementing vegetation treatment projects through the adherence to Standard Project Requirements and Mitigation Measures that will result in the avoidance and minimization of adverse impacts to environmental resources."*

This claim is dangerously false. The CalVTP advocates for the wholesale clearance of native shrublands far distant from communities at risk. This will increase the chance of type conversion (extirpation) of native shrublands by adding yet another stressor on the system, a point the CalVTP acknowledges itself. In addition, such an approach will do nothing to protect communities from the wildfires that kill the most people and burn nearly all the homes – those that are wind-driven. Even the CalVTP admits vegetation treatments will prove ineffective under such conditions.

Secondly, by applying the Sierran mixed-conifer fire suppression paradigm to coastal zone forests, as both the CalVTP and the reports do, ecologically inappropriate management strategies are likely to be implemented.

The CalVTP also fails to properly address the threat of type conversion of native shrublands as a consequence of habitat clearance and logging projects in a manner that is consistent with science and state law.

How the CalVTP defines type conversion is a testament to obfuscation.

After nearly two decades of resistance in previous drafts, the current CalVTP acknowledges the threat of type conversion due to too frequent fire. However, it improperly defines type conversion by limiting it to the terminal condition (shrubland to grassland), rather than considering the actual process that begins with reduced biodiversity. Then, mitigation measure SPR BIO-5 within the CalVTP rejects even this definition and creates an impossibly ambiguous one based on "habitat value," a subjective measurement that will be determined by the "project proponent." This presents a clear conflict of interest and passes off the determination of a key environmental impact of a project to a future, unknown entity.

Under such a definition, there is nothing to preclude a project proponent from converting native shrubland to non-native grassland in order to "improve" the habitat value for deer. Such projects have been implemented in the past by Cal Fire and the US Forest Service.

The CalVTP attempts to explain this ambiguity by claiming it is beyond its scope to define type conversion properly. This is absurd. The contention that a programmatic EIR cannot establish a proper definition of type conversion is contrary to the huge body of research and a violation of California Environmental Quality Act (CEQA) guidelines.

Since an approved programmatic EIR allows project proponents like San Mateo and Santa Cruz Counties avoid scrutiny of projects by the public and independent researchers who would normally have opportunities to comment and/or object through CEQA, the PWPs under consideration are basically blank checks to Cal Fire and other habitat clearance interests.

It is for these and many other reasons we are challenging the CalVTP in court. It is based on bad science. Please see our letter to the California Board of Forestry concerning the CalVTP for additional details.

Clearing habitat is not the answer to fire risk reduction

Finally, the PWPs will be based on the false assumption that habitat clearance is the most effective way to protect communities.

> *"…the CalVTP PEIR serves as the primary analysis tool to help reduce risks to life, property, and natural resources by targeting vegetation reduction and/or modification in the State Responsibility Area (SRA)…"*

We have shown through extensive documentation that such an approach will not only fail to address the wind-driven wildfires that cause nearly all the fatalities and home losses in California, but may make the situation worse by spreading flammable, invasive weeds and destroying intact ecosystems. Please see our attached letter to the California State Legislature for additional details.

Extra time needed to establish science-based policy

The two proposals in question are just the beginning of a massive effort to remove or alter natural habitats throughout California, with the coastal zone being especially vulnerable.

Outside of climate change and destructive logging/clearance practices of federal public lands in California, Cal Fire and the CalVTP present the most dire threats to native habitats throughout the state. Beyond the courts, the Commission provides one of our best hopes to check the unrestrained ambitions of the biomass industry, habitat clearance contractors, timber interests, and the Cal Fire bureaucracy.

The Coastal Commission has always provided the bright light of truth in a foggy sea of self-interest and bureaucratic bungling. Despite efforts to influence it, to weaken it, and to

change its mission, the Commission has held true to its purpose – protecting nature along the coastal zone, helping Californians access that nature, and protecting nature in the face of powerful interests.

Therefore, we urge the Commission to deny or postpone any decision on the proposed PWPs of San Mateo and Santa Cruz Counties. Both are based on a failed Cal Fire model that ignores the best available science.

Such action will allow the Commission time to consult with independent experts, such as researchers from USGS, the National Park Service in the Santa Monica Mountains National Recreation Area, and others, to provide it accurate, scientific information to make an informed decision.

Sincerely,

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