

CALIFORNIA COASTAL COMMISSION

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September 26, 2022

TO: United States Forest Service
Attention: Christopher Stubbs
Forest Supervisor

FROM: California Coastal Commission
Shana Gray, Deputy Director, Statewide Planning Unit

SUBJECT: Los Padres National Forest Ecological Restoration Project Scoping Plan (#62369)

Dear Mr. Stubbs,

Thank you for the opportunity to provide comments on the July 22, 2022 *Los Padres National Forest (LPNF) Ecological Restoration Project Scoping Plan* which proposes to restore fire-adapted ecosystems, reduce fuel loads, and reintroduce fire on four of the five Ranger Districts within the LPNF. As a regulatory agency committed to reducing fire hazards and restoring resilient, fire-adapted ecosystems in the coastal zone, we recognize the urgency in carrying out projects of this magnitude to address catastrophic wildfires.

The California Coastal Commission (hereafter, the Commission) plans and regulates the use of land and water in the coastal zone. Under the California Coastal Act (Public Resources, Code § 30000 et seq.), the Commission is charged with upholding core coastal resource protection policies, including minimizing risks from hazards, such as wildfire, and protecting water quality and sensitive coastal resources such as rare species and habitats. Development¹, which is defined broadly under the Coastal Act, under local or state jurisdiction may not commence until a Coastal Development Permit (CDP) has been issued by either the Commission or by a local government that is authorized to issue permits in the coastal zone through delegation of a Commission-certified Local Coastal Program.

Pursuant to the Coastal Zone Management Act of 1972, all federal agency activities and development projects, as well as projects involving federal permits, licenses, or funding, that have reasonably foreseeable effects on any land or water use or natural resource of the coastal zone must be found consistent with the enforceable policies of the California Coastal Management Program, namely Chapter 3 of the Coastal Act. Since the LPNF Ecological Restoration Project is proposed within portions of the coastal zones of Monterey and Santa Barbara counties and would result in effects to coastal resources, federal consistency review is needed. While we await submittal of a consistency determination for the proposed project, we would like to initiate a discussion of how it relates to coastal resource protection, as highlighted in more detail below:

¹ Development activities in the coastal zone are broadly defined by the Coastal Act to include, in part, the placement or erection of any solid material or structure; the construction, reconstruction, demolition, or alteration of the size of any structure; land divisions and lot line adjustments; activities that change the intensity of use of land, water, or public access to coastal waters; grading, dredging, and the extraction of any materials; and the removal of major vegetation (not including the harvesting of vegetation for agricultural purposes, kelp harvesting, and timber operations in accordance with a timber harvesting plan) (see Public Resources Code, § [30106](#)).

1. Scale of Fuels Reduction Treatment. The project overwhelmingly favors treatment activities that will provide defensible space through the establishment of fuel breaks in strategic locations and containment areas around structures, roads, trails, and properties. In some cases, treatments proposed to maintain defensible space will occur as far as a mile or two from a structure due to its classification as a *WUI Threat Zone*. It would be particularly useful to understand the rationale and routine management of such defensible space as research has shown that infrastructure protection is more effective where structures are “hardened²” that includes retrofitting with fire-resistant materials to withstand wildfire impacts in conjunction with fuel reduction around the structure generally no more 100 feet. Further, fuel breaks are proposed to be as wide as 1500 feet in forested areas and 300 feet in chaparral habitat. Fuel breaks of this size may result in large areas of cleared vegetation that is harmful to habitat integrity, opens up large areas of habitat to edge effects, has the potential to adversely impact sensitive species and habitats, is unsightly to park-goers, and potentially results in areas of invasive annual plants that may be contrary to wildfire containment. The Scoping Plan should provide more discussion of the effectiveness of these expansive defensible space projects, particularly those located in extremely remote areas.
2. Treatment within Chaparral Habitat for Hazard Reduction. The Scoping Plan discusses how chaparral is the dominant vegetation type across the LPNF and how such habitat has seen an increase in the frequency of large fires. Many of the chaparral communities across the coastal zone in Monterey and Santa Barbara Counties consist of extremely rare endemic species that comprise very localized and unique stands of coastal and maritime chaparral with the highest rarity rankings assigned to California habitats. These habitats typically have much longer natural fire return intervals than more inland stands. We note that research on appropriate treatment within chaparral, including assessing appropriate fire return intervals, are varied and recommend reframing treatment goals for chaparral towards restoring ecological integrity instead of establishing defensible space. A less extensive width for fuel break creation within chaparral should also be explored given the sensitivity of this habitat to fire. Indeed, treatment of this highly unique habitat requires additional research on appropriate vegetation management techniques, including determining the appropriate length of fire return intervals for different chaparral habitat types and geographic locations, and should be approached through a lens of restoration rather than strict fuel reduction.
3. Development of Resource Protection Measures through Agency Coordination. The Scoping Plan discusses how the forthcoming Environmental Assessment will include the proposed resource protection measures; however, we encourage the Forest Service to develop these protection measures in collaboration with applicable public agencies and stakeholders to the extent feasible. The Commission has worked with numerous state and local agencies such as CalFire, the California Department of Parks and Recreation, and County Resource Conservation Districts to develop coastal-specific resource protection measures as part of our Public Works Plans to help streamline Coastal Act authorization. We believe that the LPNF Ecological Restoration Project would greatly benefit from such collaboration, as it would aid in identifying coastal resource concerns and appropriate responses.
4. Scale of Project Requires Preparation of an Environmental Impact Statement. The scale of the project involves vegetation management over 235,000 acres of forested lands, as well as shrublands and grasslands. We believe that such an endeavor will require more robust and finer scale analyses of environmental impacts, project alternatives, and

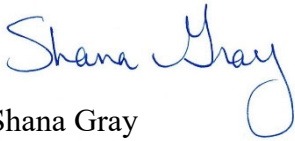
² <https://www.readyforwildfire.org/prepare-for-wildfire/get-ready/hardening-your-home>

mitigation measures that would be best served through the preparation of an Environmental Impact Statement (EIS) and not an Environmental Assessment. We urge the Forest Service to prepare an EIS for this project from the start.

5. Consultation with California Native American Tribes and Environmental Justice (EJ) Communities. The Scoping Plan fails to mention how California Native American Tribes and Environmental Justice communities will be consulted in the design phase of the project. Tribal governments and EJ communities are critical stakeholders in the coastal zone and throughout the state. We encourage the Forest Service to work with these stakeholders to identify priority areas for treatment and to develop mitigation measures to ensure protection of tribal cultural resources.

Thank you for the opportunity to provide comments on the LPNF Ecological Restoration Project Scoping Plan. We appreciate your consideration of our comments and look forward to coordinating with you. If you have any questions or would like to discuss these comments, please do not hesitate to contact me at Shana.Gray@coastal.ca.gov.

Sincerely,



Shana Gray
Deputy Director of Statewide Planning
California Coastal Commission