CALIFORNIA CHAPARRAL INSTITUTE

...the voice of the chaparral

June 11, 2012

William Metz
Forest Supervisor
Cleveland National Forest
10845 Rancho Bernardo Road, Suite 200
San Diego, CA 92127–2107
Sent via email to: socal_nf_lmp_amendment@fs.fed.us

Dear Supervisor Metz,

We would like to thank the US Forest Service for recommending the following roadless areas for wilderness designation: No Name, Cedar Creek, San Diego River, Eagle Peak, Sill Hill, Barker Valley, Caliente (Cleveland NF), Fish Canyon, Salt Creek (Angeles NF).

However, we challenge the USFS's rational for rejecting the opportunity to properly protect the other inventoried roadless areas as per the January 3, 2011 Settlement Agreement. The reason for our challenge is the fact that **the USFS continues to misrepresent and misunderstand the value of, and the science concerning, the main ecosystem within the four nationals forests of Southern and Central California, *the chaparral*.**

National Forest	Total acres	Acres in chaparral and other shrubland	Percent shrubland
Los Padres	1,774,520	1,149,277	64%
Angeles	662,409	474,506	71%
San Bernardino	664,830	346,940	52%
Cleveland	420,245	370,654	88%

Percentage of Shrubland in Southern California National Forests. From Halsey (2008). Data source, USFS.

Instead of viewing chaparral as a valuable ecosystem, the 2012 Southern California National Forests Land Management Amendment continues the practice of characterizing the primary habitat it should be protecting as either "fuel" that needs to be mitigated, or as a "dull," unattractive landscape that "hampers" the ability of citizens to enjoy public

lands. This approach is not acceptable and raises serious questions about the validity of the USFS's criteria and decision making process in determining the level of protection of the land it administers.

Such a perspective cannot be attributed to a lack of understanding of the different types of chaparral because of the extensive work done by many scientists to distinguish the various forms of chaparral (Sawyer and Keeler-Wolf 1995) and how these assemblages differ in terms of fire response, drought conditions, and resilience to fire frequency (Keeley 1991, Keeley and Fotheringham 1998, Kummerow et al. 1977, Keeley 1995, Zedler 1995, Jacobson et al. 2004).

Contrary to perspectives within the Amendment's IRA Analysis document, we urge the USFS to consider the following:

1. Chaparral is NOT dull, an impediment to public enjoyment. While chaparral can clearly be impenetrable, that is the ecosystem's natural condition. Dense chaparral is not an artifact of past fire suppression nor it something the USFS should be using as a reason not to protect lands covered by it.

Part of the USFS's rejection of the Black Mountain Roadless Area for additional protection included (pg 144), *"The overall appearance of the area is of rounded landforms covered with dull green chaparral. The landscape is lacking in variety and distinctive landforms, vegetation or water forms, which make it minimally attractive."*

For the Diablo Roadless Area, a proposed addition to the Matilija Wilderness in the Los Padres National Forest (pg 159): *"The landscape attractiveness in Diablo is minimal, lacking in variety and distinctive features of landform, vegetation or water forms. The overall appearance of the unit is mundane; chaparral vegetation, rounded landforms, typical of the character type but lacking the variety found in other locations nearby."*

One of the most frequent characterizations of chaparral in the Amendment is not that it is a unique, valuable ecosystem, but rather that it prevents access by the public into the backcountry. Statements such as, *"Cross-country exploring provides some interesting challenges although travel is hampered by dense chaparral vegetation,"* and, *"Steep terrain and dense continuous chaparral vegetation acts to discourage visitation,"* can be found on pgs 12, 19, 25, 30, 32, 36, 39, 40, 56, 77, 96, 16, 162, 169, 186, 192, 194, 202, 210, 250, 274, 280, 287, 293, and 301.

2. Chaparral is a distinguished habitat.

Pg 94: *"Although chaparral is the dominant vegetation type**, two unique plant communities also occur here:** coastal sage scrub on the south-facing slopes and knobcone pine (Pinus attenuata) near Pleasants Peak."*

3. Chaparral is critical to preserving biodiversity. The two statements below are remnants of an era when one of the main goals of land management agencies was to increase the populations of game for hunters. At a time when increasing fire frequencies are threatening the remaining beautiful, old-growth stands of chaparral, such a policy has no place in today's management plans. These statements also appear to suggest that the USFS sees the chaparral as needing continual management because without it, biodiversity would unnaturally decrease and large fires would increase. Neither opinion is supported by current science.

Pg 145: *"These large fires have caused stress on the ecosystem and created large even age stands of chaparral that limits biodiversity of wildlife."*

Pg 201: *"Most recently, the 1996 Highway 58 fire burned 99% of the unit. As such, nearly all the vegetation is even-aged chaparral. Without active management, this vegetation type tends to reduce wildlife habitat and biodiversity over time and may be at risk to burn in a future large fire event."*

4. Chaparral *is* the forest, not a hindrance to timber production and forest management. Even though trees make up a small portion of the four Southern California National Forests, the Amendment spends an inordinate amount of time referring to forests. The USFS needs to formally acknowledge that while there are some beautiful groves of unique tree species, the four forests are not really forests at all, but primarily native shrublands. This is one of the reasons why we have proposed changing the name of the four forests into National Chaparral Recreation Areas (please see the attached California Chaparral Preservation Plan).

The following statement illustrates the continual bias in favor of trees even when the USFS acknowledges the predominance of chaparral.

Pg 148: *"Timber products may be created through the construction of Wildland Urban Interface defense zones along with thinning activities designed to improve the health of the remaining forest. These products and services will be needed to help enhance the forested environment and it move towards the condition where it has the capacity for renewal and recovery from a wide range of disturbances. Vegetation is 95% chaparral and 5% conifer species."*

5. Large, contiguous stands of chaparral are natural, not an artifact of past fire suppression. Dozens of papers have made it very clear that this old paradigm is not only incorrect, but has led to potentially damaging land management policies. Yet the paradigm appears to persist in the Amendment. For example, in a rather peculiar statement, the Amendment states that the huge Matilija Fire was an example of "historic fire conditions" yet proceeds to suggest that fire suppression since that time has altered the natural fire regime. We are unclear what "alteration" the Amendment is suggesting:

Pg 247: *"The massive 1932 Matilija Fire burned most of the land in these units and is an important example of historic fire conditions in chaparral fuels prior to alteration of fire regimes by widespread fire suppression."*

Pg 105: *"The normal interplay between biotic species inhabiting this area is mostly intact, although natural fire intervals have been modified..."*

In a comprehensive examination of fire regimes in the United States, researchers have concluded that the chaparral covered coastal mountain region of California, *"...is dominated by human-caused ignitions, and fire suppression has played a critical role in preventing the ever increasing anthropogenic ignitions from driving the system wildly outside the historical fire return interval. Because the net result has been relatively little change in overall fire regimes,* ***there has not been fuel accumulation in excess of the historical range of variability,*** *and as a result, fuel accumulation or changes in fuel continuity do not explain wildfire patterns." (Keeley, et al. 2009)*

Even the USFS's own scientists have rejected the fire suppression paradigm, especially when it comes attempting to create artificial, mixed-aged mosaics in chaparral as a pre-fire management tool. Conard and Weise concluded in 1998 that, "*landscape mosaics are impractical, unnecessary, and probably not particularly effective***"** in creating a strategic approach to fuel and fire management in chaparral.

The mosaic approach is mentioned in the Amendment when addressing community fire protection:

Pg 9 (Proposed Action document): *"The desired condition for chaparral is to establish a diversity of shrub age classes in key areas near communities to improve the effectiveness of fire suppression operations. Adequate defensible space around communities could greatly reduce the risk of structure loss, as well as improve safety for residents."*

While we agree that defensible space is critical in protecting human communities from wildfire, we urge the USFS to apply Dr. Jack Cohen's research on fire in order to minimize the impact and size of vegetation treatments beyond standard defensible space zones (100-200 feet).

Dr. Cohen (1999) has concluded after extensive investigations that home ignitions are not likely unless flames and firebrand ignitions occur within 120 feet of the structure. His findings have shown that, "*…effective fuel modification for reducing potential WUI (wildland/urban interface) fire losses need only occur within a few tens of meters from a home, not hundreds of meters or more from a home. This research indicates that home losses can be effectively reduced by focusing mitigation efforts on the structure and its immediate surroundings."*

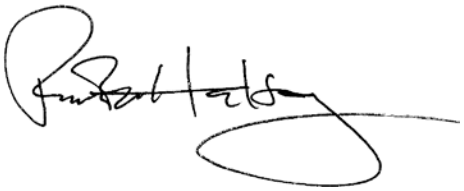
6. The chaparral does need protection from fire. While the Amendment specifically mentions coastal sage scrub as needing protection from increased fire frequencies, the

chaparral is not. There is clear scientific evidence indicating chaparral is also at risk for type-conversion due to increased fire frequencies and climate change.

Pg 9: (Proposed Action document): *"The desired condition for coastal sage scrub is to increase the average interval between fires thereby reducing the area at risk of type conversion."*

We urge the USFS to include chaparral as a unique, native ecosystem in need of protection as it revaluates its decisions on the inventoried roadless areas.

Sincerely,



Richard W. Halsey
Director
California Chaparral Institute
P.O. Box 545
Escondido, California 92029
www.californiachaparral.com
760.822.0029

Suggested References

Cohen, J.D. 1999. Reducing the wildland fire threat to homes: where and how much? USDA Forest Service Gen. Tech. Report PSW-GTR-173, pp 189-195.

Cohen, J.D. 2000. Preventing disaster: home ignitability in the wildland-urban interface. Journal of Forestry 98: 15-21Cohen, J. and J. Saveland. 1997. Structure ignition assessment can help reduce fire damages in the W-UI. Fire Mgt. Notes 57:19-23.

Conard, S. G., and D. R. Weise. 1998. Management of fire regime, fuels, and fire effects in southern California chaparral: lessons from the past and thoughts for the future. Pages 342-350 in Teresa L. Pruden and Leonard A. Brennan (eds.). Fire in ecosystem management: shifting the paradigm from suppression to prescription. Tall Timbers Fire.

Jacobsen, A.L., S.D. Davis, S. Fabritius. 2004. Vegetation type conversion in response to short fire return intervals in California chaparral. Annual Meeting of the Ecological Society of America, Portland OR. *Abstract.*

Keeley, J.E. 1995. Future of California floristics and systematics: wildfire threats to the California flora. Madrono 42: 175-179.

Keeley, J.E. 1991. Seed germination and life history syndromes in the California chaparral. The Botanical Review 57: 81-116.

Keeley, J.E. and C.J. Fotheringham. 2001. The historical role of fire in California shrublands. Conservation Biology 15: 1536-1548.

Keeley, J.E. and C.J. Fotheringham. 1998. Smoke-induced seed germination in California chaparral. Ecology 79: 2320-2336.

Keeley, J.E., A.H. Pfaff, and H.D. Safford. 2005. Fire suppression impacts on postfire recovery of Sierra Nevada chaparral shrublands. International Journal of Wildland Fire 14: 255-265.

Keeley, J.E.; Aplet, G.H.; Christensen, N.L.; Conard, S.C.; Johnson, E.A.; Omi, P.N.; Peterson, D.L.; Swetnam, T.W. 2009. Ecological foundations for fire management in North American forest and shrubland ecosystems. Gen. Tech. Rep. PNW-GTR-779. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 92 p.

Keeley, J.E. and P.H. Zedler. 2009. Large, high-intensity fire events in southern California shrublands: debunking the fine-grain age patch model. Ecological Applications 19: 69-94.

Kummerow, J., Krause, D., and Jow, W. 1977. Root systems of chaparral shrubs. Oecologia 29: 163-177.Lanner, R.M. 2002. Conifers of California. Cachuma Press, Los Olivos, California. Second printing.

Larigauderie, A., T.W. Hubbard, and J. Kummerow. 1990. Growth dynamics of two chaparral shrub species with time after fire. Madrono 37: 225-236.

Lombardo, K.J., T.W. Swetnam, C.H. Baisan, M.I. Borchert. 2009. Using bigcone Douglas-fir fire scars and tree rings to reconstruct interior chaparral fire history. Fire Ecology 5: 32-53.

Sawyer, J.O, and T. Keeler-Wolf. 1995. A Manual of California Vegetation. California Native Plant Society.Schaffer, J.P. 1993. California's geological history and changing landscapes. In Hickman, J.C. (ed.) The Jepson Manual, Higher Plants of California. University of California Press.

Zedler, P.H. 1995. Fire frequency in southern California shrublands: biological effects and management options, pp. 101-112 in J.E. Keeley and T. Scott (eds.), Brushfires in California wildlands: ecology and resource management. International Association of Wildland Fire, Fairfield, Wash.