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CENTER FOR REGENERATIVE AGRICULTURE • CHANNEL ISLANDS RESTORATION
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SUNRISE MOVEMENT SLO • SYV COMMUNITY ACTION ALLIANCE
TEMESCAL CANYON ASSOCIATION • VENTANA WILDERNESS ALLIANCE
VENTURA AUDUBON SOCIETY • THE WILDERNESS SOCIETY
THE WILDLANDS CONSERVANCY • WISHTOYO CHUMASH FOUNDATION

August 14, 2020

Los Padres National Forest
Attn: Kevin Elliott, Forest Supervisor
6750 Navigator Dr #150, Goleta, CA 93117
kevin.b.elliott@usda.gov

Re: Reyes Peak Forest Health and Fuels Reduction Project

Dear Mr. Elliott:

The undersigned organizations, representing hundreds of thousands of members throughout California and the United States, are writing to express our concerns with the Reyes Peak Forest Health and Fuels Reduction Project ("Project") on Pine Mountain Ridge in the Los Padres National Forest. The Project

entails clearing chaparral and logging conifer trees up to 24" in diameter at breast height ("DBH") as well as up to 64" DBH with some stipulations along six miles of one of the most important and beloved mountains in the region. The Project would potentially be accomplished through a timber sale or stewardship contract, either of which could involve commercial logging of large trees.

We support science-based efforts to protect communities from wildfire, including smart vegetation management directly adjacent to structures and within communities. We advocate for programs that promote the construction and retrofitting of homes with fire-safe materials and design as the most effective ways to protect communities from wildfire. We also support science-based efforts to protect forests and shrublands, such as through invasive plant eradication, road decommissioning, and aquatic organism passage barrier removal.

The scoping letter issued by the U.S. Forest Service states that the agency intends to approve the proposed action using two categorical exclusions ("CE") under the Healthy Forest Restoration Act of 2003 ("HFRA"). These CEs are listed as:

- Section 603 of HFRA (16 U.S.C. 6591b), Insect and Disease Infestation
- Section 605 of HFRA (16 U.S.C. 6591d), Wildfire Resilience

By relying on these CEs to approve the Project, the U.S. Forest Service has selected the lowest level of environmental review for these projects and the least amount of public input. Excluding the project from standard environmental review is not in the public's interest, nor does it do justice for the rare plants, roadless and proposed wilderness areas, special-status wildlife, old-growth forests and chaparral, and important Native American cultural sites that define Pine Mountain Ridge.

There are several problems with the agency's use of these CEs for the Project. The presence and significance of several "extraordinary circumstances" make the project ineligible for a categorical exclusion. Furthermore, projects that utilize HFRA CEs must be developed using a collaborative process. This process is defined as one that "includes multiple interested persons representing diverse interests" and "is transparent and nonexclusive." Despite representing diverse interests focused on protecting natural and cultural resources in the Los Padres National Forest, none of our organizations have been invited to collaborate in the development of this project.

According to HFRA, the Project must also be one that "considers the best available scientific information to maintain or restore the ecological integrity, including maintaining or restoring structure, function, composition, and connectivity." Yet, the agency is not considering the best available science, and the Project may reduce ecological integrity.

The Project involves several "extraordinary circumstances" that require preparation of an EA at a minimum, including impacts to sensitive plants and impacts to a roadless area. There are at least eleven plant species listed as sensitive by the U.S. Forest Service that are known to occur in or near the Project area and could be impacted by the use of heavy equipment and other Project activities.

Approximately 259 acres or 34% of the Project area is part of the Sespe-Frazier Inventoried Roadless Area ("IRA"). The removal of much of the chaparral and a significant number of trees in the area would substantially alter the roadless character of the Sespe-Frazier IRA and could violate the rule's prohibition on timber harvesting. Additionally, many of these same roadless areas are proposed for wilderness designation as part of the Central Coast Heritage Protection Act (H.R. 2199 and S. 3288). This legislation passed the U.S. House of Representatives in early 2020 and is currently under consideration by the U.S. Senate.

The agency has also neglected to examine the best available science regarding forest and fire ecology in the region as well as the efficacy of remote vegetation clearing to protect communities from wildfire. The Project description contains mischaracterizations about natural fire ecology in the area as well as the ability of the Project to affect future fire behavior or aid in suppression.

Numerous peer-reviewed studies detail the importance of mixed-severity fire for maintaining biodiversity and historical landscape heterogeneity in mixed-conifer and yellow pine forests such as those found on Pine Mountain (Odion et al. 2014; DellaSala and Hanson 2015; Tingley et al. 2016; and Baker and Williams 2018). While it is unlikely that vegetation removal projects will encounter a fire (Schoennagel et al 2017), studies have found that high-severity fire is still increased in fuels-reduced forests under extreme weather conditions (Finney et al. 2003; Lydersen et al. 2014) or in logged areas and forests with fewer protections (Hanson and Odion 2006; Bradley et al 2016). Furthermore, logging activities similar to what is proposed in the Project generally release three times more carbon than they prevent from being emitted in a future fire (Campbell et al 2012)—an important consideration in the context of climate change.

Importantly, even under moderate weather conditions there is evidence from a recent fire just outside of the Project area that long-unburned mixed-conifer stands are not at increased risk of high-severity fire and are well within their historical range of variability for the occurrence of such fire. According to the Monitoring Trends in Burn Severity dataset, prepared in part by the U.S. Forest Service, the 2016 Pine Fire that burned just over 2,300 acres one mile east of the Project area occurred as a mostly low- to moderate-severity fire (86% of the total area). Of the 16% of the fire area that burned at high-severity, only a small fraction was in mixed-conifer forest (most was in chaparral, which naturally burns at high-severity). In fact, of the nearly 850 acres of mixed-conifer stands that were located within the fire area, only 4% burned at high-severity. Like most of the Project area, these stands had not burned in over 80 years and thus had similar levels of tree and shrub biomass. Thus, a recent fire with the same mix of vegetation types that had not experienced fire for roughly the same amount of time mostly burned at low- and moderate-severity without any pre-fire vegetation removal. It seems that the Project will attempt to solve a problem that does not exist.

Much of the chaparral that would be affected by the Project is old-growth, which has become increasingly rare in the region (Halsey and Syphard 2015). Masticating or clearing chaparral across more than 300 acres of the Project area to create a remote fuel break will likely increase fire risk along the ridge by spreading highly flammable invasive grasses and weeds (Keeley 2003; Brooks et al. 2004; Fusco et al. 2019) while failing to protect communities miles away. Studies have found that remote fuel breaks are largely ineffective in aiding suppression of wind-driven fires (Syphard et al 2011a; Syphard

et al 2011b), which cause the vast majority of damage to communities in California (Jin et al. 2015). Pine Mountain Ridge is several miles away from any community, and the U.S. Forest Service's own assessment of potential and existing fuel breaks in the southern Los Padres National Forest ranks the Project as 118 out of 163 in terms of priority.

Additionally, the use of a CE for the project does not align with the U.S. Forest Service's previous decisions to prepare an Environmental Assessment ("EA") or an Environmental Impact Statement ("EIS") for several similar and smaller projects across the Los Padres National Forest. These include the 2018 Monterey Strategic Community Fuelbreak Improvement Project (542 acres) and the 2006 Figueroa Mountain Project (665 acres). In fact, the agency indicated that it would prepare an EA for a 210-acre, non-commercial project around the campgrounds on Pine Mountain Ridge in 2005 before dropping the project for unknown reasons in 2012.

For the reasons outlined above, we urge the U.S. Forest Service to either withdraw this project or to start the process anew by collaborating with key conservation interests and committing to the development of a more thorough EA or EIS. This environmental analysis should examine all potential impacts of the Project on plants and wildlife, the Sespe-Frazier IRA and proposed wilderness areas, soil and water resources, outdoor recreation opportunities, and scenic resources in addition to alternatives to commercial logging and mastication of rare old-growth chaparral.

Thank you for considering these comments as you continue to examine the best course of action to take regarding the Project.

Sincerely,

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350 Santa Barbara

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