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AMERICAN ALPINE CLUB • AMERICAN BIRD CONSERVANCY • ANTHROPOCENE ALLIANCE
BARBAREÑO/VENTUREÑO BAND OF MISSION INDIANS
BATTLE CREEK ALLIANCE & DEFIANCE CANYON RAPTOR RESCUE
CALIFORNIA WILDLIFE FOUNDATION/CALIFORNIA OAKS • CAMBRIA FOREST COMMITTEE
CASCADIA CLIMATE ACTION NOW • CENTER FOR BIOLOGICAL DIVERSITY
CENTRAL COAST ENVIRONMENTAL VOTERS • CHANNEL ISLANDS RESTORATION
CITIZENS FOR A CLEAN BLACK LAKE • CLIMATE FIRST: REPLACING OIL & GAS • CLIMATE HAWKS VOTE
COASTAL BAND OF THE CHUMASH NATION • COASTAL RANCHES CONSERVANCY
COMMITTEES FOR LAND, AIR, WATER AND SPECIES (CLAWS) • COMMUNITY ENVIRONMENTAL COUNCIL
CONEJO CLIMATE COALITION • CONEJO VALLEY AUDUBON SOCIETY • CREEK LANDS CONSERVATION
EARTH ETHICS • ENDANGERED HABITATS LEAGUE • ENVIRONMENTAL DEFENSE CENTER
ENVIRONMENTAL PROTECTION INFORMATION CENTER (EPIC)
FIREFIGHTERS UNITED FOR SAFETY, ETHICS, AND ECOLOGY (FUSEE)
FOREST CARBON COALITION • FOREST WEB • GAVIOTA COAST CONSERVANCY • GREEN SNOHOMISH
GREENSPACE - THE CAMBRIA LAND TRUST • GROUNDSWELL CHARLESTON
HISPANIC ACCESS FOUNDATION • JOHN MUIR PROJECT OF EARTH ISLAND INSTITUTE
KEEP SESPE WILD • KLAMATH FOREST ALLIANCE • LATINO OUTDOORS • LOS PADRES FORESTWATCH
MONTEREY AUDUBON SOCIETY • MORRO COAST AUDUBON SOCIETY • MOUNTAIN LION FOUNDATION
MOUNTAIN NEIGHBORS • MOUNTAIN PROGRESSIVES • NORTH COUNTY WATCH
PACIFIC CREST TRAIL ASSOCIATION • PARTNERSHIP FOR POLICY INTEGRITY • PATAGONIA
QUAIL SPRINGS • RESTORE: THE NORTH WOODS • RUNNERS FOR PUBLIC LANDS
SAGE TRAIL ALLIANCE • SANTA BARBARA AUDUBON SOCIETY • SANTA BARBARA BOTANIC GARDEN
SANTA BARBARA CHANNELKEEPER • SANTA BARBARA MUSEUM OF NATURAL HISTORY
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SUNRISE MOVEMENT PDX • SUSTAINABLE ROGUE VALLEY • SYV COMMUNITY ACTION ALLIANCE
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VENTURA AUDUBON SOCIETY • VENTURA COASTKEEPER • VENTURA LAND TRUST
WATERWAY ADVOCATES • WE WATCH • WESTERN WATERSHEDS PROJECT
WILD NATURE INSTITUTE • WILDEARTH GUARDIANS • WILDERNESS WATCH
WILD ORCA • WISHTOYO FOUNDATION

September 27, 2022

Supervisor Christopher Stubbs
U.S. Forest Service
1980 Old Mission Dr
Solvang, CA 93463
Christopher.Stubbs@usda.gov

Re: Los Padres National Forest “Ecological Restoration Project”

Dear Forest Supervisor Stubbs:

The 81 organizations signed below represent tens of thousands of people who are concerned about the protection of natural and cultural resources, sustainable and equitable outdoor recreation, and community wildfire protection in Los Padres National Forest along California’s Central Coast and other national forests across the country. We support science-based, community-focused wildfire mitigation efforts such as home hardening, defensible space management, human-caused ignition prevention, evacuation and alert system improvements, and other activities adjacent to homes and critical infrastructure.

The proposed “Ecological Restoration Project” (ERP) is by far the largest native vegetation removal project in Los Padres National Forest. At 235,000 acres, it is approximately 311 times the size of the “Reyes Peak Forest Health and Fuels Reduction Project” approved in 2021. The Reyes Peak Project was opposed by 16,000 people throughout the region as well as dozens of conservation organizations, Indigenous groups, businesses, and municipal governments. That project involves the same activities—use of heavy equipment to cut trees and masticate shrubs—that are in the ERP proposal. Despite opposition to the Reyes Peak Project and criticism by dozens of scientists and other experts, the U.S. Forest Service continues to pursue even more extreme backcountry vegetation removal far from communities at risk.

The 235,000-acre ERP includes areas scattered across the national forest from Frazier Mountain to Big Sur. Many of these areas are, in addition to being miles from communities, some of the most beloved areas in the Los Padres National Forest. Places such as the summit of Iwhinmu (Mt. Pinos), Figueroa Mountain and surrounding trails, the entirety of West Cuesta Ridge and the Cuesta Ridge Botanical Special Interest Area, and entire swaths of the Santa Lucia Mountains in the Big Sur region are slated for native vegetation removal using heavy equipment. Below are some of the natural and cultural resources that would be significantly impacted by the ERP:

- Countless cultural and archeological sites, as well as landscapes sacred to local Indigenous people—according to U.S. Forest Service records, more than 1,000 such sites exist within a small portion of the ERP area that has been surveyed so far
- More than 104,000 acres of inventoried roadless areas (IRAs), including nearly 99% of the Tepusquet Peak IRA, 92% of the Chalk Peak IRA, and 66% of the Tequepis IRA
- 18 federally protected threatened or endangered plant and wildlife taxa, including over 63,000 acres of designated critical habitat for species such as the California condor
- At least 70 plant and wildlife taxa considered “sensitive” by the U.S. Forest Service
- Over 35,000 acres of proposed wilderness and national scenic areas, 30 miles of proposed wild and scenic rivers, and 48 miles of the proposed Condor National Scenic Trail as part of the widely supported Central Coast Heritage Protection Act that recently passed the U.S. House of Representatives
- 113 campgrounds, day use areas, and trailheads as well as 136 miles of non-motorized trails, 159 miles of motorized trails, and 100 miles of roads that are primarily used as non-motorized trails

The sheer size and scope of the ERP is difficult to comprehend, especially considering that the activities being proposed in the name of fire mitigation or ecosystem health have repeatedly been shown to fail to mitigate wildfire spread under extreme weather conditions—when the vast majority of acreage burned and community damage occurs each year—and they have been shown to cause significant ecological impacts in chaparral, mixed-conifer forest, and other local ecosystems. And as climate change worsens and extreme weather conditions become more common, remote fuel breaks and other vegetation removal activities will become even less effective and potentially more harmful to ecosystem resilience.

Given the fact that the ERP would allow the use of heavy machinery to cut trees up to two feet in diameter across 48,800 acres, to cut any number of trees of any size and age across 186,000 acres, and to masticate or grind native shrubs and understory habitat across the entirety of the ERP area, the level of environmental analysis must be proportionate. The U.S. Forest Service has indicated that a single environmental assessment (EA) will be prepared for the entire ERP area. Based on the size and scope of the proposal, an environmental impact statement (EIS) should be prepared instead.

The agency has prepared an EIS for smaller projects, such as the 542-acre “Strategic Community Fuelbreak Improvement Project” in the Monterey Ranger District of the Los Padres National Forest that was approved in 2018. The ERP is over 430 times the size of that project.

If a project that involves heavy equipment use and intensive native vegetation removal across more than 235,000 acres does not rise to the need for an EIS, then what does?

The U.S. Forest Service must prepare an EIS for the ERP before moving forward. The EIS should analyze several alternatives, including a significantly scaled-back version of the ERP that avoids sensitive and protected areas such as IRAs, proposed and potential Wilderness, critical biological zones, special interest management areas, research natural areas, and designated critical habitat for threatened and endangered species. In addition, the EIS should evaluate a much more strategically-targeted proposal that focuses on vegetation treatments adjacent to structures along with partnerships with local jurisdictions to encourage and promote home hardening, defensible space around homes, improved evacuation routes, and human-caused ignition reduction on private and public lands.

It is imperative that the U.S. Forest Service conducts an appropriate level of environmental review for a project of such immense scale and scope, and the best available science must be incorporated into this decision-making process. More prudent would be an approach that first goes back to the drawing board given the numerous flaws with the current proposal.

Sincerely,

Philip Carver
Co-Coordinator
350 Salem OR

Steve Holmer
Vice President of Policy
American Bird Conservancy

Sharon Broberg
Steering Committee Member
350 Santa Barbara

Harriet Festing
Executive Director
Anthropocene Alliance

Jan Dietrick
Policy Team Leader
350 Ventura County Climate Hub

Dayna Barrios
Chairwoman
Babareño/Ventureño Band of Mission
Indians

Debra Campbell
Chairperson
A Community Voice

Marily Woodhouse
Director
Battle Creek Alliance & Defiance Canyon
Raptor Rescue

Mike Garrity
Executive Director
Alliance for the Wild Rockies

Janet Cobb
Executive Officer
California Wildlife Foundation/California
Oaks

Taylor Luneau
Policy Director
American Alpine Club

J. Crosby Swartz
President
Cambria Forest Committee

Sally Keely
Founder
Cascadia Climate Action Now

Justin Augustine
Senior Attorney
Center for Biological Diversity

Ana Rosa Rizo-Centino
Board President
Central Coast Environmental Voters

Aaron Kreisberg
Staff Ecologist
Channel Islands Restoration

Esther Kronenberg
Co-Chair
Citizens for a Clean Black Lake

Haley Ehlers
Associate Executive Director
Climate First: Replacing Oil & Gas

RL Miller
President
Climate Hawks Vote

Mia Lopez
Tribal Chairwoman
Coastal Band of the Chumash Nation

Doug Campbell
Executive Director
Coastal Ranches Conservancy

Nancy Black
Board President
Committees for Land, Air, Water and
Species

Jennifer Hernandez
Climate Justice Manager
Community Environmental Council

Rose Ann Witt
Co-Founder
Conejo Climate Coalition

Frank DeMartino
President
Conejo Valley Audubon Society

Don Chartrand
Executive Director
Creek Lands Conservation

Mary Gutierrez
Director
Earth Ethics

Dan Silver
Executive Director
Endangered Habitats League

Alicia Roessler
Senior Attorney
Environmental Defense Center

Thomas Wheeler
Executive Director
Environmental Protection Information
Center (EPIC)

Timothy Ingalsbee
Executive Director
Firefighters United for Safety, Ethics, and
Ecology

Heather Campbell
Coordinator
Forest Carbon Coalition

Cristina Hubbard
Executive Director
Forest Web

Doug Kern
Executive Director
Gaviota Coast Conservancy

Don Dillinger
Chairman
Green Snohomish

John Seed
President
Greenspace - The Cambria Land Trust

Susan Lyons
Chair
Groundswell Charleston

Shanna Edberg
Director of Conservation
Hispanic Access Foundation

Jennifer Mamola
Policy and Advocacy Manager
John Muir Project of Earth Island Institute

Alasdair Coyne
Conservation Director
Keep Sespe Wild

Kimberly Baker
Executive Director
Klamath Forest Alliance

Luis Villa
Executive Director
Latino Outdoors

Bryant Baker
Director of Conservation & Research
Los Padres ForestWatch

Amanda Preece
Environmental Advocate
Monterey Audubon Society

Judy Neuhauser
President
Morro Coast Audubon Society

Joshua Rosenau
Conservation Advocate
Mountain Lion Foundation

Mary Brooks
Manager
Mountain Neighbors (Frazier Park, CA)

Mary Brooks
Manager
Mountain Progressives

Susan Harvey
President
North County Watch

Mark Larabee
Advocacy Director
Pacific Crest Trail Association

Laura Haight
US Policy Director
Partnership for Policy Integrity

J.J. Huggins
PR, Communications & Public Policy
Patagonia

Ashwin Manthripragada
Executive Director
Quail Springs

Michael Kellett
Executive Director
RESTORE: The North Woods

Vic Thasiah
Chief Advocacy Officer
Runners for Public Lands

Dillon Osleger
Executive Director
Sage Trail Alliance

Katherine Emery, Ph.D.
Executive Director
Santa Barbara Audubon Society

Denise Knapp
Director of Conservation
Santa Barbara Botanic Garden

Ben Pitterle
Science & Policy Director
Santa Barbara Channelkeeper

Luke Swetland
President & CEO
Santa Barbara Museum of Natural History

Daniel McCarter
President
Santa Barbara Urban Creeks Council

Ara Marderosian
Executive Director
Sequoia ForestKeeper®

Katie Davis
Chair
Sierra Club Santa Barbara-Ventura Chapter

Rita Dalessio
Chapter Conservation Chair
Sierra Club Ventana Chapter

Matt Stevenson
Forest Team Lead
Sunrise Movement PDX

Jerry Allen
Representative
Sustainable Rogue Valley

Stacey Thompson
Treasurer
SYV Community Action Alliance

Janice Reid
President
Umpqua Watersheds

James Westwater
Chair
Utah Valley Earth Forum

Mike Chamberlain
Executive Director
Ventana Wilderness Alliance

Bruce Schoppe
Conservation Chair
Ventura Audubon Society

Mati Waiya
Executive Director
Ventura Coastkeeper

Melissa Baffa
Executive Director
Ventura Land Trust

Caleb Merendino
Co-Executive Director
Waterway Advocates

Nancy Emerson
President
WE Watch

Laura Cunningham
California Director
Western Watersheds Project

Monica Bond, Ph.D.
Principal Scientist
Wild Nature Institute

Christopher Krupp
Public Lands Attorney
WildEarth Guardians

George Nickas
Executive Director
Wilderness Watch

Teri Wright
Legislation and Policy Organizer
Wild Orca

Mati Waiya
Executive Director
Wishtoyo Foundation