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WILD NATURE INSTITUTE • WILDLING MUSEUM OF ART AND NATURE
WILLIAMS COMMUNITY FOREST PROJECT

August 17, 2022

Supervisor Christopher Stubbs
U.S. Forest Service
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Christopher.Stubbs@usda.gov

Re: Request for Comment Period Extension and EIS Preparation for the “Ecological Restoration Project”

Dear Forest Supervisor Stubbs:

The 71 organizations signed below represent tens of thousands of people who are concerned about land management issues in the Los Padres National Forest along California’s Central

Coast as well as in other national forests across the country.

The latest proposal—the “Ecological Restoration Project” (ERP)—is by far the largest native vegetation removal project ever proposed in the 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. As you are aware, the Reyes Peak Project was opposed by 16,000 people throughout the region as well as dozens of conservation organizations, Indigenous groups, businesses, and even 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 has doubled down on backcountry vegetation removal conducted after inadequate environmental review as its preferred management approach.

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. The project also covers 35,000 acres of proposed wilderness and national scenic areas as part of the widely supported Central Coast Heritage Protection Act that recently passed the U.S. House of Representatives.

The sheer size and scope of this project 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 48,000 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 project 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 project 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 235,000 acres—including 56,000 acres of designated critical habitat for federally threatened or endangered species—does not rise to the need for an EIS, then what does?

We therefore request that the U.S. Forest Service take the following actions:

1. Extend the comment period by an additional 90 days (for a total comment period of 120 days). This would be about six weeks longer than the 78-day comment period that was provided for the Reyes Peak Project in 2020.
2. Commit to issuing a notice of intent to prepare an EIS for the ERP if it is to move forward as currently proposed.

These actions will ensure that the public and local experts have adequate time to weigh in with concerns and relevant information.

Sincerely,

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President
350 Eugene

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