



United States Department of the Interior



FISH AND WILDLIFE SERVICE
HOPPER MOUNTAIN NATIONAL WILDLIFE REFUGE COMPLEX
CALIFORNIA CONDOR RECOVERY PROGRAM

P.O. Box 5839
Ventura, CA 93005
Tel: (805) 644-5185 Fax: (805) 644-1732

May 15, 2013

William Metz, Forest Supervisor
Cleveland National Forest
10845 Rancho Bernardo Road
San Diego, CA 92127-2107

Subject: Draft Supplemental Environmental Impact Statement, Southern California National Forest Land Management Plan Amendments

Dear Mr. Metz:

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement for the Southern California National Forests Land Management Plan Amendment (DSEIS). The Proposed Alternative, Alternative 2, would convert areas currently designated as Back Country Motorized use areas to Back Country Non-Motorized (BCNM) use areas. Alternative 3 would provide for additional areas of recommended wilderness.

Our comments on the DSEIS are specific to the California condor. The California condor historically, and currently occupies National Forest lands contemplated in the DSEIS; primarily areas of the Los Padres National Forest and Angeles National Forest. In the future, as the California condors continue to expand their range, use of the other Southern California National Forests may also increase.

As recognized in the DSEIS, the 1996 Recovery Plan for the California condor does not recommend the designation of additional wilderness areas as a means of promoting recovery. However, earlier versions of the recovery plan did focus on the conservation of condor habitat and protection from disturbance. For example the 1974 Recovery Plan for the California condor includes a recommendation to prohibit motorized vehicles between Mount Pinos and Mount Able in the Los Padres National Forest, as well as the closure of this area to mining and mineral leasing. As the population of condors and use of the Los Padres National Forest has increased substantially as a result of recovery actions, recommendations made in earlier versions of the recovery plan regarding the protection of habitat should be reconsidered and expanded to accommodate, and protect, the growing condor population.

Existing wilderness areas have proved to be beneficial to the recovery of the California condor including but not limited to the Sespe, Chumash, Dick Smith, Matilija, San Rafael, Machesna, and Garcia, Ventana Silver Peak Wilderness areas. These and other Wilderness designations within the range of the California condor provide protection from development

to important historical nesting, roosting, and foraging habitat that are now being used by the recovering population.

The potential for allowing mechanized use in BCNM areas proposed in Alternative 2, by exception, could expose important condor habitat to the wind energy development and oil and gas exploration and development. Condors are currently occupying areas that support existing oil and gas development, including private lands and areas of the Los Padres National Forest, particularly in and around the Sespe and Lake Piru areas.

Oil and gas development poses a threat to California condors if they are exposed to environmental contaminants, loose rope or strapping material in which they may become entangled, and micro-trash (small pieces of glass, metal, plastic collected and ingested by condors and fed to their chicks). The ingestion of micro-trash can result in the chick's inability to process and digest food provided by their parents in the nest, potentially leading to starvation. Condors have also been injured or killed as a result of becoming entangled or entrapped in human structures, loose ropes or similar strapping material, and through the ingestion of harmful items, including chemicals such as ethylene glycol.

Wind energy is a threat to California condors as they expand their range into areas with existing and proposed wind development. In 2010 the Service established a California Condor Wind Energy Work Group (Work Group). The Work Group is an appointed recovery team per section 4(f)(2) of the Endangered Species Act, to assist the Services recovery efforts by assessing the risks of wind energy development and recommending actions that can be taken to minimize these risks. The work group includes a representative from Los Padres National Forest.

Condors are gregarious and often travel in groups. Thus, the potential for wind energy development to kill or injure multiple condors at the same time is a substantial threat. The Los Padres National Forest currently supports nesting California condors that regularly travel between nesting areas in and around Hopper Mountain National Wildlife Refuge and the Sespe Condor Sanctuary to Bitter Creek National Wildlife Refuge, and the Tehachapi Mountains. Expanding wind development to National Forest lands currently used by condors in the Los Padres National Forest, or that are within their historic range in on other National Forest Lands contemplated in the DSEIS, and likely to be used by condors in the future, would further expose condors to this threat.

Additionally, Condors that have become overly comfortable around human activity and human structures are at greater risk to behavioral conditioning, which ultimately may affect their ability to survive in the wild because they may associate humans with food or exposed to the risks described previously including entanglement, poisoning, and micro-trash. A condor that is accustomed to being in close proximity human activity and human structures may also teach these behaviors to other condors given the social nature of the species. Condors that become comfortable perching on human structures and remain in close contact with humans may become habituated and need to be removed from the wild for their own protection and the protection of the free-flying population.

Although the Proposed Alternative would result in increased protection of important California condor habitat beyond that which is protected under the No Action Alternative, Alternative 3 (Recommended Wilderness Emphasis) would provide the greatest protections to the California condor and its habitat within the four Southern California forests. Because recovery actions would focus on activities compatible with the Wilderness Act including the potential to use motorized access if necessary to support species recovery consistent with wilderness objectives would be allowed to continue under recommended wilderness, expanded wilderness designations would not negatively affect California condor recovery efforts. For these reasons, we recommend the Forest Service choose Alternative 3.

If you have any questions or concerns regarding this letter, please contact me at (805) 644-5185, extension 294.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Kirkland", written in a cursive style.

Steve Kirkland
California Condor Field Coordinator