



Barbareno/Ventureno Band of Mission Indians
365 North Poli Avenue
Ojai, CA 93023
805-794-0455

August 9, 2020

Los Padres National Forest
6750 Navigator Drive
Goleta, CA 93117

Subject: Comments in Opposition to the Reyes Peak Forest Health & Fuels Reduction Project

Forest Administrator:

This letter is to express our concerns and opposition to the Los Padres National Forest proposed “Reyes Peak Forest Health and Fuels Reduction Project.”

Our primary concern is the project’s lack of attention and near total insensitivity to the potential impact to Chumash cultural values and resources. The project description’s half-page “Heritage” section makes no reference at all to any field survey for cultural resources and no engagement of Chumash interests and concerns.

Not only did this project’s scoping fail to include any cultural resources field survey, the project’s implementation plan is equally flawed. The proposed Heritage strategy is a wholly inadequate notice to the Forest Archaeologist and Tribal Liaison should any unanticipated resources be discovered *after* the project is already launched and destructive equipment is in the field.

Without any requirement for Chumash monitors on site, for example, we ask just how does the project leadership anticipate such discovery? And if there is any discovery, what is the plan to cease activity, assess, mitigate or shut down once this massive resource destruction is already launched? There is no meaningful plan or consideration for the protection of cultural resources, in complete and total violation of federal and state standards for cultural protections.

As a further indication of the project’s insensitivity to cultural considerations, page 12 of the project summary includes the statement that the project area has “low wilderness values” (even though the project is immediately adjacent to the Sespe Wilderness). That may be the Forest Service’s scientific judgment, but it is neither an appropriate or valid Chumash heritage or cultural conclusion.

The Pine Mountain Ridge and Reyes Peak (Opnow to the Chumash) are among the highest promontories in Chumash territory. From Pine Mountain and Reyes Peak the views stretch to

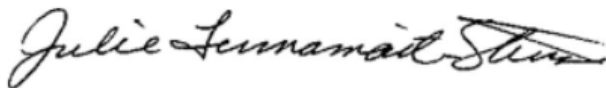
the far boundaries of our lands, inland to the Cuyama Valley and south to the Channel Islands. Reyes Peak/Opnow is a well-known central observation point, saturated with cultural and ceremonial significance. We know, for example, the extraordinary cultural significance of Mount Pinos (Iwihinmu) and the Topa Topas, all part of the Chumash upper world. Pine Mountain and Reyes Peak/Opnow belong to the same complex of Chumash sacred lands and deserve and demand the same attention and consideration we would expect and demand be given those peaks and landscapes.

The Forest Service has put the cart before the horse. This entire project needs to be put on hold. Our request and insistence is for the Forest Service to satisfy the standards set in NEPA for an Environmental Impact Statement. Such analysis must include a full assessment of the area's cultural significance and a comprehensive cultural resources field survey and analysis involving not only an archaeologist but also trained Chumash monitors and interpreters of what is significant to us culturally and ceremonially.

The current project summary considers no option but to clear trees with no consideration of impacts to our Chumash cultural values and resources. A full and meaningful analysis needs to include consideration of a "no project" option as the appropriate protection of our Chumash cultural resources.

Should you have any questions, please contact me at 805-794-0455 or jtumamait@hotmail.com.

Sincerely,

A handwritten signature in black ink that reads "Julie Tumamait-Stenslie". The signature is written in a cursive, flowing style.

Julie Tumamait-Stenslie
Chair, Barbareno/Ventura Band of Mission Indians

Cc: Kimberly Rivers, Ventura Reporter
Jeff Kuyper, Forest Watch