



**BOARD OF SUPERVISORS
COUNTY OF VENTURA**

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From the Desk of **STEVE BENNETT**
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August 4, 2020

Kevin Elliott, Supervisor
Los Padres National Forest
6750 Navigator Way, Suite 150
Goleta, CA 93117

Re: Reyes Peak Forest Health and Fuels Reduction Project

Dear Supervisor Elliott:

As the Ventura County Supervisor for the project area and nearest cities, I would like to express my strongest objections to this project for the following reasons.

1. By the LPNF's own study, the fuel break would be of negligible value.

The "LPNF Southern Districts Strategic Fuel Break Assessment" ranks the Pine Mountain fuel break as priority No. 150 out of 163 projects. The project receives a "Values at Risk" score of 3 out of a possible 28, and a Wildland-Urban Interface (WUI) score of zero. Were it not for a high "workability" score, the Pine Mtn. fuel break would have received a total score of 3 out of a possible 64, placing it below the lowest-ranked project in the four Ranger Districts.

It is also important to note that the Pine Mtn - Reyes Pk. ridge already has an impregnable fuel break in the form of the paved two-lane width Pine Mountain Road which extends along the length of the project. This road already serves as an absolute fuel break in low-intensity fires, and could be augmented with retardant drops. The proposed ridge-top fuel break is recognized as inadequate to stop wind-driven fires, and is only expected to contain low-intensity fires; itself a questionable proposition with its likely rapid re-vegetation with highly flammable grasses.

It should also be noted for the record that placing fire fighters on the 7-mile ridge-top fuel break during a potentially intense or wind-driven fire would potentially be highly dangerous. The access road is a seven-mile long, very winding dead-end with many short-radius turns, making firefighter escape slow and easily obstructed by fire or collisions.

2. Fire Prevention and Fuel Break Resources Would Be Much Better Spent in the WUI

The proposed project lies 3-15 miles outside the WUIs of the nearest communities. Per the LPNF Strategic Fuel Break Assessment, resources should be allocated to most effectively protect these communities by providing fuel breaks within the WUI. Projects in the WUI provide the double benefit of protecting communities from forest fires, and protecting the forest from community fires.

3. LPNF has Disregarded the Economic and Recreation Impacts of the Project

Pine Mtn. is a very high value recreation site for both day use and family camping. It attracts visitors from a multi-county area including Ventura, Santa Barbara, Kern, and Los Angeles Counties who fill the dozens of campsites nearly every weekend of camping season. The project would all but eliminate the recreational value of the area during its construction phase, and the proposed substantial tree removal would permanently significantly degrade the most attractive feature of this pristine area.

Pine Mtn. provides many highly popular recreational activities: family camping, hiking, bird and wildlife watching, backpacking, rock climbing, star gazing, cross country skiing, hunting, firewood gathering, and regional trailhead access. The LPNF must assess and address the project's impact on recreation and recreation resources before approving the project.

The Pine Mtn. and Reyes Pk. campgrounds are successfully and profitably operated by a private concessionaire (Parks Management). The project would economically harm the concessionaire.

Visitors to Pine Mountain patronize local businesses, particularly in the Ojai Valley and rural gateway communities. Impairing the recreational appeal of Pine Mtn. will economically harm local businesses in gateway communities.

The LPNF must calculate and address the economic impact of the proposed project on the campground concessionaire and local businesses in gateway communities before project approval.

4. Significant Environmental impacts, Need for EA

In addition to the recreation resource impacts that should be addressed in an EA, biological impacts must be thoroughly addressed through up-to-date biological field studies:

- Rare, threatened, endangered, or locally significant plants, lichens, trees, birds, mammals, and reptiles.
- Unique and significant multi-species habitat.
- Habitat impairment or conversion through direct impacts, maintenance activities, and associated soil desiccation or erosion.

5. LPNF Site Assessment and Habitat Evaluation is Fundamentally Flawed

The assertion that the trees on Pine Mountain can be improved by removing them is not supported by adequate evidence. LPNF relies on the nearly century-old 1930 broad-scale, and inaccurate tree cover study, and an inappropriate model of forest health. The trees and forest on Pine Mountain have been stable and in balance for many decades and there is no evidence to support that this will not continue to be the case well into the future.

The percentage of dead trees on Pine Mountain is low compared to most conifer zones in Southern and Central California. Patches of dead trees lead over time to beneficial habitat transition and eventual tree regrowth, all of which are beneficial to various species and part of the ecology of the area and forests generally. Individual dead trees provide important roosting and nesting for birds including the California Condor, as well as habitat for many animals

The assertion that the presence of mistletoe justifies tree removal is not supported by local studies and ignores that dwarf mistletoe is a native species that has successfully coexisted with conifers on Pine Mtn. for many centuries. Were mistletoe lethal to the conifer forest, the forest would have disappeared long ago.

The proposed project would have far more devastating impact on the trees, ecology, and habitat of Pine Mountain than not approving the project. The health of the forest should be studied in a new field study and project impacts assessed in an EA.

Conclusion

The Project should be dropped for having little to no benefit and significant adverse impacts. Funds should instead be spent on higher-priority fuel break, recreation, and habitat restoration projects. If the project is allowed to move forward, an EA must be completed before project approval.

Cordially,



Steve Bennett

Ventura County First District Supervisor

CC: Congressman Salud Carbajal
Congresswoman Julia Brownley