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June 22, 2020

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

Re: Reyes Peak Forest Health and Fuels Reduction Project

Dear Mr. Elliott:

I am writing today to respectfully request that due to the difficulties associated the U.S. Forest Service's June 11, 2020 online public hearing and generally with public engagement challenges during the COVID 19 pandemic that you please extend the comment period for Reyes Peak Forest Health and Fuels Reduction Project ("Project") on Pine Mountain Ridge in the Los Padres National Forest by 30 days. Despite, the U.S. Forest Service's more recent commitment to another public hearing before the June 30, 2020, an extension will allow the public enough time to review the information and materials that will be provided.

Secondly, the Project entails clearing chaparral and logging conifer trees up to 24" in diameter at breast height ("DBH") as well as up to 64" DBH with some stipulations along six miles of largely old-growth Chaparral and Forest, which has become increasingly rare habitat in the region<sup>1</sup>. The U.S. Forest Service's scoping letter states that the agency intends to approve the proposed action using two categorical exclusions ("CE") under the Healthy Forest Restoration Act of 2003 ("HFRA"). These CEs are listed as: a) Section 603 of HFRA (16 U.S.C. 6591b), Insect and Disease Infestation; and, b) Section 605 of HFRA (16 U.S.C. 6591d), Wildfire Resilience.

The Los Padres hosts several ecologically sensitive areas and a Categorical Exemption (CE) does not align with the U.S. Forest Service's previous decisions to prepare an Environmental Assessment ("EA") or an

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<sup>1</sup> Halsey, R. W. and A.D. Syphard (2015) High-Severity Fire in Chaparral: Cognitive Dissonance in the Shrublands. D. A. DellaSala and C.T. Hanson, Eds. In *The Ecological importance of Mixed-severity Fires: Nature's Phoenix*, pp. 177-209. Amsterdam: Elsevier.

Environmental Impact Statement (“EIS”) for several similar and smaller projects across the Los Padres National Forest. Namely, the 2018 Monterey Strategic Community Fuelbreak Improvement Project (542 acres) and the 2006 Figueroa Mountain Project (665 acres). In 2005, your agency indicated that it would prepare an EA for a 210-acre, non-commercial project around the campgrounds on Pine Mountain Ridge. Therefore, it is imperative that an EA/EIS be completed for this Project to ensure the required environmental review is completed to protect special status wildlife, rare plants (some eleven listed species are found in the Project area) and old-growth forest and chaparral, important Native American cultural sites, as well as the integrity of ecological pattern and process. Portions of the Project area is also proposed for a wilderness designation as part of the Central Coast Heritage Protection Act (H.R. 2199 and S. 3288). This legislation passed the U.S. House of Representatives in early 2020 to expand the Sespe Wilderness and is currently under consideration by the U.S. Senate.

Furthermore, masticating or clearing chaparral to create fuel breaks has also shown to support highly flammable invasive, non-native grasses and weeds with the likelihood of increasing fire risk<sup>2</sup>. Remote fuel breaks are largely ineffective in aiding suppression of wind-driven fires<sup>3</sup>.

For the reasons outlined above, we urge the Forest Service to extend the comment period for the Project and commit to preparing a more thorough EA or EIS. This environmental analysis should examine all potential impacts of the Project on plants and wildlife, the Sespe-Frazier IRA and proposed wilderness areas, soil and water resources, and scenic resources in addition to alternatives to commercial logging and mastication of rare old-growth chaparral.

Thank you for consideration.

Sincerely,



Linda Parks  
Supervisor, District 2

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<sup>2</sup> Fusco, E.J., J.T. Finn, J.K. Balch, R.C. Nagy, and B.A. Bradley (2019) Invasive grasses increase fire occurrence and frequency across US ecoregions. PNAS, 116(47):23594-23599.

Keeley, J.E. (2003) Fire and invasive plants in California ecosystems. Fire Management Today, 63(2):18-19.

Brooks, M.L., C.M. D’Antonio, D.M. Richardson, J.B. Grace, J.E. Keeley, J.M. DiTomaso, R.J. Hobbs, M. Pellant, and D. Pyke (2004) Effects of invasive alien plants on fire regimes. Bioscience, 54(7):677-688.

<sup>3</sup> Syphard, A.D., J.E. Keeley, and T.J. Brennan (2011) Comparing the role of fuel breaks across southern California national forests. Forest Ecology and Management, 261:2038-2048.