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A COMMUNITY VOICE • ALLIANCE FOR THE WILD ROCKIES •  
AMERICAN ALPINE CLUB • AMERICAN BIRD CONSERVANCY • ANTHROPOCENE ALLIANCE  
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BATTLE CREEK ALLIANCE & DEFIANCE CANYON RAPTOR RESCUE  
CALIFORNIA WILDLIFE FOUNDATION/CALIFORNIA OAKS • CAMBRIA FOREST COMMITTEE  
CASCADIA CLIMATE ACTION NOW • CENTER FOR BIOLOGICAL DIVERSITY  
CENTRAL COAST ENVIRONMENTAL VOTERS • CHANNEL ISLANDS RESTORATION  
CITIZENS FOR A CLEAN BLACK LAKE • CLIMATE FIRST: REPLACING OIL & GAS • CLIMATE HAWKS VOTE  
COASTAL BAND OF THE CHUMASH NATION • COASTAL RANCHES CONSERVANCY  
COMMITTEES FOR LAND, AIR, WATER AND SPECIES (CLAWS) • COMMUNITY ENVIRONMENTAL COUNCIL  
CONEJO CLIMATE COALITION • CONEJO VALLEY AUDUBON SOCIETY • CREEK LANDS CONSERVATION  
EARTH ETHICS • ENDANGERED HABITATS LEAGUE • ENVIRONMENTAL DEFENSE CENTER  
ENVIRONMENTAL PROTECTION INFORMATION CENTER (EPIC)  
FIREFIGHTERS UNITED FOR SAFETY, ETHICS, AND ECOLOGY (FUSEE)  
FOREST CARBON COALITION • FOREST WEB • GAVIOTA COAST CONSERVANCY • GREEN SNOHOMISH  
GREENSPACE - THE CAMBRIA LAND TRUST • GROUNDSWELL CHARLESTON  
HISPANIC ACCESS FOUNDATION • JOHN MUIR PROJECT OF EARTH ISLAND INSTITUTE  
KEEP SESPE WILD • KLAMATH FOREST ALLIANCE • LATINO OUTDOORS • LOS PADRES FORESTWATCH  
MONTEREY AUDUBON SOCIETY • MORRO COAST AUDUBON SOCIETY • MOUNTAIN LION FOUNDATION  
MOUNTAIN NEIGHBORS • MOUNTAIN PROGRESSIVES • NORTH COUNTY WATCH  
PACIFIC CREST TRAIL ASSOCIATION • PARTNERSHIP FOR POLICY INTEGRITY • PATAGONIA  
QUAIL SPRINGS • RESTORE: THE NORTH WOODS • RUNNERS FOR PUBLIC LANDS  
SAGE TRAIL ALLIANCE • SANTA BARBARA AUDUBON SOCIETY • SANTA BARBARA BOTANIC GARDEN  
SANTA BARBARA CHANNELKEEPER • SANTA BARBARA MUSEUM OF NATURAL HISTORY  
SANTA BARBARA URBAN CREEKS COUNCIL • SEQUOIA FORESTKEEPER®  
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VENTURA AUDUBON SOCIETY • VENTURA COASTKEEPER • VENTURA LAND TRUST  
WATERWAY ADVOCATES • WE WATCH • WESTERN WATERSHEDS PROJECT  
WILD NATURE INSTITUTE • WILDEARTH GUARDIANS • WILDERNESS WATCH  
WILD ORCA • WISHTOYO FOUNDATION

September 27, 2022

Supervisor Christopher Stubbs  
U.S. Forest Service  
1980 Old Mission Dr  
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Christopher.Stubbs@usda.gov

Re: Los Padres National Forest “Ecological Restoration Project”

Dear Forest Supervisor Stubbs:

The 81 organizations signed below represent tens of thousands of people who are concerned about the protection of natural and cultural resources, sustainable and equitable outdoor recreation, and community wildfire protection in Los Padres National Forest along California’s Central Coast and other national forests across the country. We support science-based, community-focused wildfire mitigation efforts such as home hardening, defensible space management, human-caused ignition prevention, evacuation and alert system improvements, and other activities adjacent to homes and critical infrastructure.

The proposed “Ecological Restoration Project” (ERP) is by far the largest native vegetation removal project in 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. The Reyes Peak Project was opposed by 16,000 people throughout the region as well as dozens of conservation organizations, Indigenous groups, businesses, and 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 continues to pursue even more extreme backcountry vegetation removal far from communities at risk.

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. Below are some of the natural and cultural resources that would be significantly impacted by the ERP:

- Countless cultural and archeological sites, as well as landscapes sacred to local Indigenous people—according to U.S. Forest Service records, more than 1,000 such sites exist within a small portion of the ERP area that has been surveyed so far
- More than 104,000 acres of inventoried roadless areas (IRAs), including nearly 99% of the Tepusquet Peak IRA, 92% of the Chalk Peak IRA, and 66% of the Tequepis IRA
- 18 federally protected threatened or endangered plant and wildlife taxa, including over 63,000 acres of designated critical habitat for species such as the California condor
- At least 70 plant and wildlife taxa considered “sensitive” by the U.S. Forest Service
- Over 35,000 acres of proposed wilderness and national scenic areas, 30 miles of proposed wild and scenic rivers, and 48 miles of the proposed Condor National Scenic Trail as part of the widely supported Central Coast Heritage Protection Act that recently passed the U.S. House of Representatives
- 113 campgrounds, day use areas, and trailheads as well as 136 miles of non-motorized trails, 159 miles of motorized trails, and 100 miles of roads that are primarily used as non-motorized trails

The sheer size and scope of the ERP 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 48,800 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 ERP 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 ERP 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 more than 235,000 acres does not rise to the need for an EIS, then what does?

The U.S. Forest Service must prepare an EIS for the ERP before moving forward. The EIS should analyze several alternatives, including a significantly scaled-back version of the ERP that avoids sensitive and protected areas such as IRAs, proposed and potential Wilderness, critical biological zones, special interest management areas, research natural areas, and designated critical habitat for threatened and endangered species. In addition, the EIS should evaluate a much more strategically-targeted proposal that focuses on vegetation treatments adjacent to structures along with partnerships with local jurisdictions to encourage and promote home hardening, defensible space around homes, improved evacuation routes, and human-caused ignition reduction on private and public lands.

It is imperative that the U.S. Forest Service conducts an appropriate level of environmental review for a project of such immense scale and scope, and the best available science must be incorporated into this decision-making process. More prudent would be an approach that first goes back to the drawing board given the numerous flaws with the current proposal.

Sincerely,

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