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**File Code:** 1950; 1510  
**Date:** August 18, 2022

The Honorable Salud Carbajal  
U.S. House of Representatives  
2331 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Carbajal:

Thank you for your letter dated August 11, 2022, and for your support of the Los Padres National Forest and our efforts to implement projects like the Ecological Restoration Project, which is designed to make landscapes more resilient to wildfire and communities and infrastructure safer.

Your support of the Infrastructure Investment and Jobs Act of 2021 is providing critical funding and new authorities that will help us confront the wildland fire crisis, take actions that contribute to the national 10-year Wildfire Crisis strategy for protecting communities and improving the resilience of America's forests, and execute other important management actions on the Los Padres National Forest.

The Ecological Restoration Project is our latest proposal to restore fire-adapted ecosystems, reduce fuels, and reintroduce fire on the landscape by prescribed burning. The project would restore vegetation resiliency to environmental stressors and improve forest health, increase community and infrastructure protection, and improve wildfire containment opportunities by establishing and maintaining fuelbreaks and defense zones. Once this planning process is completed, we hope to secure Infrastructure Investment and Jobs Act funds for its implementation.

In your letter, you requested an extension to the comment period, and completion of an Environmental Impact Statement for the Ecological Restoration Project. I will address each of these requests below.

The engagement and involvement of forest stakeholders is an important part of the National Environmental Policy Act (NEPA) compliance process for this and other activities on the Los Padres National Forest. Feedback from the public helps us identify potential issues to address through the environmental analysis process and refine our proposals resulting in better projects and management of the lands we have been entrusted. To that end, as described in our scoping notice dated July 22, 2022, we will be providing several opportunities throughout the NEPA process to engage forest stakeholders about the project and facilitate information sharing.

The first opportunity, which we refer to as the scoping period, occurs early in the project planning and design process. The 30-day scoping period is currently underway through August 28, 2022. A second 30-day public engagement opportunity will be provided at a future date coinciding with the release of a draft environmental assessment. And a third engagement



opportunity, known as an objection filing period, will be provided when the Los Padres National Forest releases a draft decision document. The 45-day objection filing period is only open to those who submitted comments during one of the 30-day designated opportunities in accordance with regulations at 36 CFR 218.5. Additionally, interested publics may also submit comments and provide feedback for our consideration at any time, even outside one of the above designated periods.

I have decided to extend the 30-day scoping period an additional 30 days, to conclude September 27, 2022. When combined with the 30-day comment period we will be providing later in the project planning process, and the other opportunities available to interested publics to provide feedback, I am confident this will provide adequate opportunity for public engagement.

I agree the project area is diverse and we developed the project proposal to protect and enhance those qualities. I reviewed the Forest Service regulations at 36 CFR 220.5(a)(2)<sup>1</sup> and determined an environmental impact statement was not necessary because our project would not substantially alter the undeveloped character of inventoried roadless areas (IRA) or potential wilderness areas. The project does not include road construction, and tree thinning will be focused on small trees as identified in the proposed action. I believe the project does not meet the requirements of 36 CFR 220.5(a)(2) and determined it could be analyzed in an environmental assessment.

The Los Padres National Forest has extensive experience planning, analyzing, defending, and implementing forest health and fuel reduction projects. Our team of experts includes hydrologists, wildlife biologists, foresters, archeologists, and other professionals who work together to ensure a thoughtful environmental review. Our approach with all our projects is to complete full environmental review and analysis of potential effects supported by the best available science. Analyses of similar projects indicates that these types of activities can be accomplished without significant effects to forest resources.

Further, we have completed other landscape-level and forest-wide projects documented in Environmental Assessments. Therefore, we are confident that the design of the Ecological Restoration Project can be supported with a finding of no significant impact, including work within Inventoried Roadless Areas and potential wilderness areas recommended in the Los Padres National Forest Land Management Plan. With that said, if our analysis of the project reveals significant effects that cannot be avoided or mitigated, then those impacts will be documented in an Environmental Impact Statement.

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<sup>1</sup> § 220.5 Environmental impact statement and record of decision.

(a) Classes of actions normally requiring environmental impact statements -

(2) Class 2: Proposals that would substantially alter the undeveloped character of an inventoried roadless area or a potential wilderness area. Examples include but are not limited to:

(i) Constructing roads and harvesting timber in an inventoried roadless area where the proposed road and harvest units impact a substantial part of the inventoried roadless area.

(ii) Constructing or reconstructing water reservoir facilities in a potential wilderness area where flow regimens may be substantially altered.

(iii) Approving a plan of operations for a mine that would cause considerable surface disturbance in a potential wilderness area.

I look forward to working with you and your staff to address any further concerns you have about the Ecological Restoration Project. If you have additional questions about this project, please contact me directly at 805-451-8919.

Sincerely,

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CHRISTOPHER STUBBS  
Forest Supervisor