350 SALEM OR • 350 SANTA BARBARA • 350 VENTURA COUNTY CLIMATE HUB
A COMMUNITY VOICE • ALLIANCE FOR THE WILD ROCKIES •
AMERICAN ALPINE CLUB • AMERICAN BIRD CONSERVANCY • ANTHROPOCENE ALLIANCE
BARBAREÑO/VENTUREÑO BAND OF MISSION INDIANS
BATTLE CREEK ALLIANCE & DEFIANCE CANYON RAPTOR RESCUE
CALIFORNIA WILDLIFE FOUNDATION/CALIFORNIA OAKS • CAMBRIA FOREST COMMITTEE
CASCADE 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®
SIERRA CLUB SANTA BARBARA-VENTURA CHAPTER • SIERRA CLUB VENTANA CHAPTER
SUNRISE MOVEMENT PDX • SUSTAINABLE ROGUE VALLEY • SYV COMMUNITY ACTION ALLIANCE
UMPQUA WATERSHEDS • UTAH VALLEY EARTH FORUM • VENTANA WILDERNESS ALLIANCE
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  
Solvang, CA 93463  
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 Iwihinmu (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,

Philip Carver  
Co-Coordinator  
350 Salem OR  

Steve Holmer  
Vice President of Policy  
American Bird Conservancy

Sharon Broberg  
Steering Committee Member  
350 Santa Barbara  

Harriet Festing  
Executive Director  
Anthropocene Alliance

Jan Dietrick  
Policy Team Leader  
350 Ventura County Climate Hub  

Dayna Barrios  
Chairwoman  
Barbareño/Ventureño Band of Mission Indians

Debra Campbell  
Chairperson  
A Community Voice  

Marily Woodhouse  
Director  
Battle Creek Alliance & Defiance Canyon Raptor Rescue

Mike Garrity  
Executive Director  
Alliance for the Wild Rockies  

Janet Cobb  
Executive Officer  
California Wildlife Foundation/California Oaks

Taylor Luneau  
Policy Director  
American Alpine Club  

J. Crosby Swartz  
President  
Cambria Forest Committee
Sally Keely  
Founder  
Cascadia Climate Action Now

Rose Ann Witt  
Co-Founder  
Conejo Climate Coalition

Justin Augustine  
Senior Attorney  
Center for Biological Diversity

Frank DeMartino  
President  
Conejo Valley Audubon Society

Ana Rosa Rizo-Centino  
Board President  
Central Coast Environmental Voters

Don Chartrand  
Executive Director  
Creek Lands Conservation

Aaron Kreisberg  
Staff Ecologist  
Channel Islands Restoration

Mary Gutierrez  
Director  
Earth Ethics

Esther Kronenberg  
Co-Chair  
Citizens for a Clean Black Lake

Dan Silver  
Executive Director  
Endangered Habitats League

Haley Ehlers  
Associate Executive Director  
Climate First: Replacing Oil & Gas

Alicia Roessler  
Senior Attorney  
Environmental Defense Center

RL Miller  
President  
Climate Hawks Vote

Thomas Wheeler  
Executive Director  
Environmental Protection Information Center (EPIC)

Mia Lopez  
Tribal Chairwoman  
Coastal Band of the Chumash Nation

Timothy Ingalsbee  
Executive Director  
Firefighters United for Safety, Ethics, and Ecology

Doug Campbell  
Executive Director  
Coastal Ranches Conservancy

Heather Campbell  
Coordinator  
Forest Carbon Coalition

Nancy Black  
Board President  
Committees for Land, Air, Water and Species

Cristina Hubbard  
Executive Director  
Forest Web

Jennifer Hernandez  
Climate Justice Manager  
Community Environmental Council
<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>Doug Kern</td>
<td>Executive Director</td>
<td>Gaviota Coast Conservancy</td>
</tr>
<tr>
<td>Judy Neuhauser</td>
<td>President</td>
<td>Morro Coast Audubon Society</td>
</tr>
<tr>
<td>Don Dillinger</td>
<td>Chairman</td>
<td>Green Snohomish</td>
</tr>
<tr>
<td>Joshua Rosenau</td>
<td>Conservation Advocate</td>
<td>Mountain Lion Foundation</td>
</tr>
<tr>
<td>John Seed</td>
<td>President</td>
<td>Greenspace - The Cambria Land Trust</td>
</tr>
<tr>
<td>Mary Brooks</td>
<td>Manager</td>
<td>Mountain Neighbors (Frazier Park, CA)</td>
</tr>
<tr>
<td>Susan Lyons</td>
<td>Chair</td>
<td>Groundswell Charleston</td>
</tr>
<tr>
<td>Mary Brooks</td>
<td>Manager</td>
<td>Mountain Progressives</td>
</tr>
<tr>
<td>Shanna Edberg</td>
<td>Director of Conservation</td>
<td>Hispanic Access Foundation</td>
</tr>
<tr>
<td>Susan Harvey</td>
<td>President</td>
<td>North County Watch</td>
</tr>
<tr>
<td>Jennifer Mamola</td>
<td>Policy and Advocacy Manager</td>
<td>John Muir Project of Earth Island Institute</td>
</tr>
<tr>
<td>Mark Larabee</td>
<td>Advocacy Director</td>
<td>Pacific Crest Trail Association</td>
</tr>
<tr>
<td>Alasdair Coyne</td>
<td>Conservation Director</td>
<td>Keep Sespe Wild</td>
</tr>
<tr>
<td>Laura Haight</td>
<td>US Policy Director</td>
<td>Partnership for Policy Integrity</td>
</tr>
<tr>
<td>Kimberly Baker</td>
<td>Executive Director</td>
<td>Klamath Forest Alliance</td>
</tr>
<tr>
<td>J.J. Huggins</td>
<td>PR, Communications &amp; Public Policy</td>
<td>Patagonia</td>
</tr>
<tr>
<td>Luis Villa</td>
<td>Executive Director</td>
<td>Latino Outdoors</td>
</tr>
<tr>
<td>Ashwin Manthripragada</td>
<td>Executive Director</td>
<td>Quail Springs</td>
</tr>
<tr>
<td>Bryant Baker</td>
<td>Director of Conservation &amp; Research</td>
<td>Los Padres ForestWatch</td>
</tr>
<tr>
<td>Michael Kellett</td>
<td>Executive Director</td>
<td>RESTORE: The North Woods</td>
</tr>
<tr>
<td>Amanda Preece</td>
<td>Environmental Advocate</td>
<td>Monterey Audubon Society</td>
</tr>
<tr>
<td>Vic Thasiah</td>
<td>Chief Advocacy Officer</td>
<td>Runners for Public Lands</td>
</tr>
<tr>
<td>Name</td>
<td>Title</td>
<td>Organization</td>
</tr>
<tr>
<td>--------------------------</td>
<td>------------------------------------------</td>
<td>--------------------------------------</td>
</tr>
<tr>
<td>Dillon Osleger</td>
<td>Executive Director</td>
<td>Sage Trail Alliance</td>
</tr>
<tr>
<td>Katherine Emery, Ph.D.</td>
<td>Executive Director</td>
<td>Santa Barbara Audubon Society</td>
</tr>
<tr>
<td>Denise Knapp</td>
<td>Director of Conservation</td>
<td>Santa Barbara Botanic Garden</td>
</tr>
<tr>
<td>Ben Pitterle</td>
<td>Science &amp; Policy Director</td>
<td>Santa Barbara Channelkeeper</td>
</tr>
<tr>
<td>Luke Swetland</td>
<td>President &amp; CEO</td>
<td>Santa Barbara Museum of Natural History</td>
</tr>
<tr>
<td>Daniel McCarter</td>
<td>President</td>
<td>Santa Barbara Urban Creeks Council</td>
</tr>
<tr>
<td>Ara Marderosian</td>
<td>Executive Director</td>
<td>Sequoia ForestKeeper®</td>
</tr>
<tr>
<td>Katie Davis</td>
<td>Chair</td>
<td>Sierra Club Santa Barbara-Ventura Chapter</td>
</tr>
<tr>
<td>Rita Dalessio</td>
<td>Chapter Conservation Chair</td>
<td>Sierra Club Ventana Chapter</td>
</tr>
<tr>
<td>Matt Stevenson</td>
<td>Forest Team Lead</td>
<td>Sunrise Movement PDX</td>
</tr>
<tr>
<td>Jerry Allen</td>
<td>Representative</td>
<td>Sustainable Rogue Valley</td>
</tr>
<tr>
<td>Stacey Thompson</td>
<td>Treasurer</td>
<td>SYV Community Action Alliance</td>
</tr>
<tr>
<td>Janice Reid</td>
<td>President</td>
<td>Umpqua Watersheds</td>
</tr>
<tr>
<td>James Westwater</td>
<td>Chair</td>
<td>Utah Valley Earth Forum</td>
</tr>
<tr>
<td>Mike Chamberlain</td>
<td>Executive Director</td>
<td>Ventana Wilderness Alliance</td>
</tr>
<tr>
<td>Bruce Schoppe</td>
<td>Conservation Chair</td>
<td>Ventura Audubon Society</td>
</tr>
<tr>
<td>Mati Waiya</td>
<td>Executive Director</td>
<td>Ventura Coastkeeper</td>
</tr>
<tr>
<td>Melissa Baffa</td>
<td>Executive Director</td>
<td>Ventura Land Trust</td>
</tr>
<tr>
<td>Caleb Merendino</td>
<td>Co-Executive Director</td>
<td>Waterway Advocates</td>
</tr>
<tr>
<td>Nancy Emerson</td>
<td>President</td>
<td>WE Watch</td>
</tr>
<tr>
<td>Laura Cunningham</td>
<td>California Director</td>
<td>Western Watersheds Project</td>
</tr>
<tr>
<td>Monica Bond, Ph.D.</td>
<td>Principal Scientist</td>
<td>Wild Nature Institute</td>
</tr>
</tbody>
</table>
Christopher Krupp  
Public Lands Attorney  
WildEarth Guardians

George Nickas  
Executive Director  
Wilderness Watch

Teri Wright  
Legislation and Policy Organizer  
Wild Orca

Mati Waiya  
Executive Director  
Wishtoyo Foundation