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June 20, 2025

Los Padres National Forest
Attn: Kyle Kinports - NEPA Coordinator
1980 Old Mission Drive Solvang, CA 93463
Email: kyle.kinports@usda.gov

Re: Comments on the Draft Environmental Assessment for the Los Padres Wildfire Risk Reduction Project (WRRP)

Dear Mr. Kinports:

On behalf of the 91 undersigned organizations and the thousands of members, supporters, and community stakeholders we represent, we respectfully submit these comments on the Draft Environmental Assessment (EA) for the Wildfire Risk Reduction Project (WRRP) in Los Padres National Forest. While we share the goal of protecting communities and improving ecological resilience to wildfire, we remain concerned that the current project proposal is unnecessarily broad in scope, lacks critical environmental safeguards, and falls short of providing the site-specific analysis needed to ensure ecological integrity and public safety.

We appreciate that the project has been scaled back from its original 235,000-acre footprint. This revision reflects an important step in the right direction and demonstrates responsiveness to public feedback. However, even at its reduced size of 90,796 acres, the project remains too expansive, with many proposed treatment areas located in remote, rugged, and sometimes random landscapes where vegetation removal is unlikely to offer meaningful community protection and may, in fact, undermine ecological resilience.

To improve the project and ensure it meets its stated goals while minimizing ecological harm, we offer the following recommendations.

1. Further Reduce and Refine the Project Footprint

The WRRP should be revised to further reduce its scale and focus only on areas where treatments will directly support community protection. We support consideration and adoption of the "Community Alternative" developed by Los Padres ForestWatch and partners, which prioritizes community safety and excludes remote areas that are infeasible to treat and offer little strategic value for fire suppression.

2. Prepare a Full Environmental Impact Statement (EIS)

The potential for significant impacts to federally listed species, roadless areas, outdoor recreation, cultural resources, and sensitive ecosystems requires the preparation of a full Environmental Impact Statement. The EA lacks the depth of analysis and range of alternatives necessary to comply with the National Environmental Policy Act (NEPA). The WRRP would impact 270 miles of recreational trails and numerous campgrounds, including iconic backcountry destinations that are central to public enjoyment of the forest. Treatment areas overlap with designated critical habitat for endangered species and likely contain undocumented archaeological and cultural resources. These impacts must be addressed and fully eliminated or mitigated through alternatives identified through development of a full EIS.

3. Improve Ecological Specificity and Adaptive Management Protocols

The EA lacks detailed information on how treatment methods will be tailored to the wide range of fire ecologies across the forest. We recommend:

- Establishing clear criteria for when prescribed fire will be used independently of mechanical thinning to minimize ecological harm.
- Providing ecologically appropriate tree diameter limits tailored to each specific forest type within the project footprint.
- Including adaptive management triggers that respond to negative ecological outcomes, such as the spread of invasive species or type conversion in chaparral ecosystems.
- Developing explicit criteria for selecting treatment methods, guided by on-the-ground monitoring and site-specific conditions.

4. Prioritize Treatment Areas Strategically

We urge the Forest Service to develop and disclose a prioritization framework that:

- Focuses first on degraded ecosystems and areas within strategic proximity to communities.

- Defers or eliminates treatment in remote, undisturbed, and roadless areas unless a clear, strategic need is demonstrated and impacts are minimized or avoided.

5. Address Invasive Species Risk

Mechanical disturbance (e.g. mastication in chaparral) is a well-documented vector for invasive plant spread, which in turn can increase fire risk by expanding likely ignition zones. A robust invasive species prevention and response plan is needed, including pre- and post-treatment monitoring and clear protocols for rapid mitigation.

6. Eliminate Authorization for Commercial Logging

The WRRP should not authorize commercial logging as a treatment method. While we understand the need for selective tree removal in some areas to achieve specific ecological or safety goals, allowing for the commercial sale of forest products undermines public trust and invites confusion about the project's intent. Commercial logging is not necessary to implement effective community protection strategies, and many of the proposed treatment areas are difficult to access or otherwise unsuitable for heavy equipment, which compounds ecological impacts.

7. Ensure Public Transparency by Providing an Objection Period

The Forest Service should commit to a public pre-decisional objection period, as referenced on the agency's project webpage. We urge the Forest Service not to invoke an emergency determination that would waive this important procedural safeguard. Providing an objection period allows the public to review and comment on the final decision before it is implemented, fostering transparency, avoiding future conflict, and allowing time to resolve outstanding concerns through constructive dialogue.

In conclusion, we urge the Forest Service to reframe this project around scientifically supported, community-focused wildfire strategies and to fully evaluate its ecological impacts through preparation of an Environmental Impact Statement. We remain committed to supporting collaborative solutions and urge you to meaningfully consider these recommendations as the WRRP moves forward.

Sincerely,

Sharon Broberg
Steering Committee Member
350 Santa Barbara

Harriet Festing
Executive Director
Anthropocene Alliance

Richard W. Halsey
Director
California Chaparral Institute

Daniel Gluesenkamp
President
California Institute for Biodiversity

Andrew Christie
President
California Land Watch

Nick Jensen
Conservation Program Director
California Native Plant Society

Carolyn Warren
Communications Officer and Co-Treasurer
California Native Plant Society, Channel Islands Chapter

Stacey Otte
Executive Director
California Nature Art Museum

Janet Cobb
Executive Officer
California Wildlife Foundation

Jake Twomey
State Board Chair
CALPIRG Students

Linda Castro
Assistant Policy Director
CalWild

Neil Havlik
President
Carrizo Plain Conservancy

Justin Augustine
Senior Attorney
Center for Biological Diversity

Juan Lares
Project Director
Central Coast Climate Justice Network (CCCJN/C3JN)

Audrey Alvarado
Chairwoman
Chalon Indian Council of Bakersfield

Ken Owen
Executive Director
Channel Islands Restoration

Marell Brooks

President

Citizens Planning Association

Sonia Demiray

Executive Director

Climate Communications Coalition

Haley Ehlers

Executive Director

Climate First: Replacing Oil & Gas (CFROG)

RL Miller

President

Climate Hawks Vote

Kate Gessert

Member

Climate Writers

Candice Meneghin

Executive Director

Coastal Ranches Conservancy

Nancy Black

Board President

Committees for Land, Air, Water and Species (CLAWS)

Sigrid Wright

Executive Director

Community Environmental Council

Donald Chartrand
Executive Director
Creek Lands Conservation

Pamela Flick
California Program Director
Defenders of Wildlife

Mary Gutierrez
Director
Earth Ethics, Inc.

Dan Silver
Executive Director
Endangered Habitats League

Len Montgomery
Great Outdoors Campaign Director
Environment America

Maggie Hall
Deputy Chief Counsel
Environmental Defense Center

Kimberly Baker
Conservation Director
Environmental Protection Information Center - EPIC

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

Paul Hughes
Executive Director

Forests Forever

Stephen Nickels
Treasurer/Board Member

Friends of Bell Smith Springs

Michael Wellborn
President

Friends of Harbors, Beaches and Parks (FHBP)

Ivan Vega
Associate Organizing Director

Future Leaders of America

Ana Citrin
Legal and Policy Director
Gaviota Coast Conservancy

Esther Kronenberg
Co-Chair
Green Cove Defense Committee

Pedro Hernandez
California State Program Manager
GreenLatinos

David Nickell
Council Chair
Heartwood

Vanessa Munoz
Waterways Program Manager
Hispanic Access Foundation

Ron Hess
Advocacy Member and Website Manager
Interfaith EarthKeepers

Jennifer Mamola
Policy and Advocacy Director
John Muir Project

Peter Deneen
Executive Director
Keep the Sespe Wild

Gayle Waite
President
Laguna Canyon Conservancy

Benjamin Pitterle
Director of Advocacy and Field Operations
Los Padres ForestWatch

Vanessa Terán
Director of Policy
Mixteco/Indigena Community Organizing Project (MICOP)

Shannon Simpson
Executive Director
Monterey Audubon Society

Josh Rosenau
Director of Policy & Advocacy
Mountain Lion Foundation

Mary Brooks
Manager
Mountain Neighbors

Elke Heitmeyer
Coordinator
Mountain Progressives

Teresa Romero
President/Executive Director
Native Coast Action Network

René Voss
Managing Attorney
Natural Resources Law

Belén Bernal
Executive Director
Nature for All

Dr C Mark Rockwell
V.P. Conservation
Northern California Council, Fly Fishers International

Kimberly Stroud
Executive Director
Ojai Raptor Center

Sarah Adloo

Executive Director

Old-Growth Forest Network

Pedro A Chavez

Co-Executive Director

One Step A La Vez

Lauren Anderson

Climate Forests Program Manager

Oregon Wild

Jessica Vargas de Ruiz

Co-Coordinator

Padres Juntos Promoviendo la Educación

Laura Haight

US Policy Director

Partnership for Policy Integrity

J.J. Huggins

Media & PR Manager

Patagonia

Michael Kellett

Executive Director

RESTORE: The North Woods

Kathleen Baker

Executive Director

Runners for Public Lands

Katherine Emery
Executive Director

Santa Barbara Audubon Society

Eric Cardenas
Director of Impact and Advocacy
Santa Barbara Botanic Garden

Nate Irwin
Policy Associate
Santa Barbara Channelkeeper

Ken Hough
Co-Executive Director
Santa Barbara County Action Network

Luke Swetland
President and CEO
Santa Barbara Museum of Natural History and Sea Center

Anne Burdette
President
Santa Barbara Urban Creeks Collective

Marion Schlinger
President
Santa Ynez Valley Natural History Society

Kristeen Penrod
Director
SC Wildlands

René Voss

Attorney

Sequoia ForestKeeper

Maureen Ellenberger

Chair

Sierra Club Santa Barbara-Ventura Chapter

Mila Vujovich-LaBarre

Chair

Sierra Club Santa Lucia Chapter

Rita Dalessio

Conservation Chair

Sierra Club Ventana Chapter

Brittany App

Board Secretary

SLO Beaver Brigade

Jack Eidt

Co-Founder

SoCal 350 Climate Action

Dave Willis

Chair

Soda Mountain Wilderness Council

Sharon Fisher

President

The Clinch Coalition

Helen O'Shea
California State Director
The Wilderness Society

Janice Reid
President
Umpqua Watersheds

Mike Chamberlain
Executive Director
Ventana Wilderness Alliance

Bruce Schoppe
Conservation Co-Chair
Ventura Audubon Society

Melissa Baffa
Executive Director
Ventura Land Trust

Susan Bott
President
WE Watch

Laura Cunningham
California Director
Western Watersheds Project

Dave Willis
Coordinator
Wild Hope

Monica Bond, PhD
Principal Scientist
Wild Nature Institute

Chris Krupp
Public Lands Attorney
WildEarth Guardians

Mati Waiya
Executive Director
Wishtoyo Chumash Foundation