May 16, 2013

U.S. Forest Service
ATTN: LMP Amendment
10845 Rancho Bernardo Road, Suite 200
San Diego, CA 92127

RE: Comments on the Land Management Plan Amendment, Los Padres National Forest

Dear Forest Supervisor Peggy Hernandez:

Thank you for this opportunity to comment on the U.S. Forest Service’s proposed amendment to the Land Management Plan (“LMP”) for the Los Padres National Forest. The proposed amendment will evaluate 16 inventoried Roadless Areas (“IRAs”) covering a combined 421,058 acres of the national forest to determine what level of protection these areas should receive.

As representatives of the major environmental and land and water conservation organizations in Santa Barbara, Ventura, San Luis Obispo, and Kern counties, we urge you to select the highest level of protection for many of these areas by zoning them as Recommended Wilderness (“RW”). We share a common concern that the Forest Service’s Preferred Alternative (Alternative 2) does not recommend any new areas as RW, leaving these lands, watersheds, and rare plant and wildlife habitats vulnerable to development.
While the Forest Service’s Preferred Alternative (Alternative 2) does increase protections in these areas by zoning them as Back Country Non-Motorized (“BCNM”), the BCNM zoning designation still allows for a significant level of development and resource extraction. According to Tables 60-63 in the Draft Supplemental Environmental Impact Statement (“DSEIS”), the following activities are allowed in areas zoned as BCNM:

- Oil and gas development and exploration
- Disposal/sale of National Forest System lands
- Construction and maintenance of “temporary” roads
- Construction of communication towers and facilities
- Mining exploration and development
- Wind & geothermal energy development
- Commercial harvesting of wood & other forest products
- Fuelbreak construction using type-conversion with invasive species

These development activities are allowed “by exception” in areas zoned as BCNM, but they are expressly prohibited in areas zoned as RW. The DSEIS loosely defines this exception as “Conditions which are not generally compatible with the land use zone but may be appropriate under certain circumstances.” This open-ended definition provides unlimited discretion to approve a host of environmentally harmful activities in these IRAs. These exceptions do not apply to areas zoned RW, and because of this, we believe that the best way to fully protect many of these areas is through a RW zoning designation.

More than twenty years have passed since Congress has protected any wilderness lands in the southern Los Padres National Forest. Today, the Forest Service has an opportunity to significantly expand and connect the network of wilderness lands in the forest. A wilderness recommendation is the best tool to preserve wildlife habitat and safeguard watersheds that provide sources of clean water for our farms and communities. Permanently protected open spaces enhance our quality of life, and promote outdoor recreation opportunities that boost local businesses and tourism revenues.

Our organizations – along with our more than 10,000 members from throughout the Central Coast – are committed to protecting our region’s watersheds, wildlife habitat, outdoor recreation opportunities, clean air and water, coastline, and open spaces. To this end, we urge the U.S. Forest Service to select the highest level of protection for many of the 16 IRAs in the southern Los Padres National Forest by zoning them as Recommended Wilderness (“RW”).

Thank you for your efforts to preserve our region’s rich wild heritage for future generations to enjoy.

Sincerely,

[signature page to follow]
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