



April 19, 2018

Los Padres National Forest  
Mt. Pinos Ranger District  
Attn: Gregory Thompson, Project Team Leader  
34580 Lockwood Valley Rd, Frazier Park, CA 93225  
gsthompson@fs.fed.us

RE: Tecuya Ridge and Cuddy Valley Projects

Dear Mr. Thompson:

Thank you for this opportunity to provide your agency with initial comments on the Tecuya Ridge Shaded Fuelbreak Project ("Tecuya Ridge Project") and the Cuddy Valley Forest Health/Fuels Reduction Project ("Cuddy Valley Project"). The Tecuya Ridge Project entails constructing a 12-mile-long, 1,626-acre shaded fuelbreak along Tecuya Ridge and the Cuddy Valley Project entails harvesting timber from 1,200 acres of mixed-conifer forest in Cuddy Valley. Both proposed projects are located in the Mt. Pinos Ranger District of the Los Padres National Forest. Both projects would be accomplished through a commercial logging operation in mixed conifer stands as well as mastication and hand treatment of up to 95 percent of sagebrush-scrub within the project areas — approximately 1,100 acres of which are within the Antimony Inventoried Roadless Area ("IRA").

The undersigned organizations support efforts to improve ecosystem health and protect communities from wildfires, and work to ensure that vegetation treatment activities are undertaken with minimal impacts to wildlife, roadless areas, water supplies, and other forest resources. We also support the maintenance of defensible space immediately around structures along with programs to promote the construction and retrofitting of homes with fire-safe materials and design as the most effective ways to protect communities from wildfire.

We have reviewed both project proposals issued as part of their scoping process as well as supplemental documentation in full, and we have several concerns about each project and the potential lack further documentation in an environmental assessment (“EA”) or environmental impact statement (“EIS”).

Both project descriptions state that the U.S. Forest Service intends to approve each project using a categorical exclusion (“CE”) for “timber stand and/or wildlife habitat improvement activities” set forth in 36 CFR § 220.6(e)(6). This CE does not apply to either project for three reasons. First, both projects qualify as actions that would normally require the preparation of an EIS (40 CFR § 1501.4). Second, the presence and significance of several “extraordinary circumstances” make the projects ineligible for a categorical exclusion. Third, the “timber stand and/or wildlife habitat improvement” CE does not explicitly allow commercial logging; that can only be authorized under other CEs with much lower acreage limitations than the proposed Projects. For these reasons, the U.S. Forest Service must prepare an EA or EIS that fully identify, evaluate, and mitigate potential impacts of each project.

The Tecuya Ridge Project involves several “extraordinary circumstances” that require preparation of an EA at a minimum, including impacts to endangered and sensitive wildlife and impacts to the roadless area. The Tecuya Ridge Project Area is located within the San Emigdio Mountains Important Bird Area identified by the National Audubon Society due to its rich habitat for several bird species such as the endangered California condor (*Gymnogyps californianus*). In fact, the California condor is well-known to occur on and around Tecuya Ridge with at least 38 active roosting sites within and near the Tecuya Ridge Project Area. Condors use roosting sites for shelter and rest during long flights across the landscape, and they are critical to the continued survival and recovery of the birds. The Tecuya Ridge Project allows for the removal of live or dead trees of any size, including those greater than 40-70 feet tall. The removal of any trees — especially large coniferous trees — within 0.5 miles of condor roosting sites may significantly impact these important habitat features.

Another species the U.S. Forest Service must consider in an EA is the California spotted owl (*Strix occidentalis occidentalis*; “CSO”), a species currently under review for protection under the Endangered Species Act (“ESA”) and that has been observed within 100 feet of the Tecuya Ridge Project Area. According to the California Natural Diversity Database (“CNDDDB”), there have been dozens of CSO detections and the U.S. Forest Service has designated five protected activity centers (PACs) near the Tecuya Ridge Project Area. The Tecuya Ridge Project would reduce the old-growth stands of pinyon, ponderosa, and Jeffrey pine as well as white fir and bigcone Douglas-fir to between 40 and 60 ft<sup>2</sup> basal area per acre — well below the basal area per acre needed by CSO. Moreover, approximately 45% of the Tecuya Ridge Project Area (or 732 acres) is within estimated CSO home range core areas according to a GIS analysis. Due to the likelihood of significant impacts to CSOs, the U.S. Forest Service must prepare an EA to determine the degree to which the Tecuya Ridge Project may affect this species proposed for listing under the ESA.

The Tehachapi monardella (*Monardella linoides* ssp. *oblonga*), a Forest Service Sensitive Species, grows in the Cuddy Valley Project Area. Mastication of vegetation may result in the accumulation of litter on the forest floor, a condition that would impact the growth of the Tehachapi monardella, which generally occurs in areas where little or no litter is present. These activities would result in increased solar radiation reaching the forest floor which would, in turn, increase ambient temperatures and cause more rapid soil surface drying — another condition that would impact the species. In addition, erosion or increased runoff has been identified as a potential threat to this taxon (CNDDDB 2018).

The Antimony IRA extends across nearly 40,513-acres of the San Emigdio Mountains. The removal of most sagebrush-scrub and a majority of trees across the 1,100 acres of the Antimony IRA within the Tecuya Ridge Project Area would substantially alter the roadless character of the Antimony IRA. Additionally, the 2001 Roadless Rule prohibits timber harvest in the Antimony IRA.

The use of a CE for these projects does not align with the U.S. Forest Service's previous decisions to prepare an EA or an EIS for several similar and smaller projects across the Los Padres National Forest. These include the ongoing Monterey Strategic Community Fuelbreak Improvement Project (542 acres), the 2012 Frazier Mountain Project (2,386 acres), and the 2006 Figueroa Mountain Project (665 acres).

For the reasons outlined above, we request that the U.S. Forest Service prepare an EA or EIS for both projects. These environmental analyses should examine all potential impacts of the projects on wildlife, IRAs, soil and water resources, and scenic resources in addition to alternatives to commercial logging.

Thank you for this opportunity to provide comments on the project. Thank you for your efforts to protect the Los Padres National Forest.

Sincerely,

Bryant Baker, Conservation Director

**Los Padres ForestWatch**

PO Box 831

Santa Barbara, CA 93102

805-617-4610 x3

bryant@lpfw.org

Matthew Sayles, Central Coast Conservation Director

**California Wilderness Coalition**

1814 Franklin St #510

Oakland, CA 94612

805-861-8170

msayles@calwild.org

Jim Lowery, Owner  
**Earth Skills**  
1113 Cougar Ct.  
Frazier Park, CA 93225  
661-245-0318  
jim@earthskills.com

Harry Love, Conservation Chair  
**National Audubon Society, Kern Chapter**  
661-805-1420  
harrylove1944@gmail.com

Ara Marderosian, Executive Director  
**Sequoia ForestKeeper**  
PO Box 2134  
Kernville, CA 93238  
760-376-4434  
ara@sequoiaforestkeeper.org

Ara Marderosian, Conservation Chair  
**Sierra Club, Kern-Kaweah Chapter**  
PO Box 3357, Bakersfield, CA 93385-3357  
661-496-6585  
ara.marderosian@kernkaweah.sierraclub.org

Katherine King, Secretary  
**TriCounty Watchdogs**  
PO Box 6407, Pine Mountain Club, CA 93222  
661-245-1725  
king@humnet.ucla.edu