



Ventana Chapter

February 8, 2013

Los Padres National Forest, Monterey Ranger District
406 South Mildred, King City, CA 93930
Attention: Jeff Kwasny

Re: Notice of intent to prepare an Environmental Impact Statement for the proposed Strategic Community Fuelbreak Improvement Project.

Dear Mr. Kwasny:

On behalf of the undersigned organizations, we submit the following comments on the notice of intent (NOI) to prepare an Environmental Impact Statement (EIS) associated with the proposed Strategic Community Fuelbreak Improvement Project.

- 1) The Proposed Action states that the construction of the wilderness portions of the fuelbreaks would utilize motorized equipment (chain saws). However, a determination of the need for administrative action and the appropriate minimum tool or activity is dependent upon the findings of a Minimum Requirements Analysis (MRA). Until an MRA is completed, it appears premature to select chain saws as the minimum tool. The MRA should be driven by the need to protect wilderness character and values.
- 2) All wilderness projects should be consistent with the direction found in FSM 2320.3 – Policy: “Where there are alternatives among management decisions, wilderness values shall dominate over all other considerations except where limited by the Wilderness Act, subsequent legislation, or regulations.”
- 3) Consistent with the “minimum requirements” required by the Wilderness Act, we ask that you carefully evaluate the benefits of using traditional tools and sustaining the skills necessary for their use.
- 4) Referencing “(1a) Palo Colorado Vicinity–Non-Wilderness” of the Proposed Action:
 - a) The Proposed Action would establish a 2.8 mile long fuelbreak on the historic fireline atop Skinner Ridge. It should be recognized that the Ventana Wilderness boundary, originally established in 1969, follows the topographic centerline of Skinner Ridge for a portion of this distance. Parts of the historic fireline created during the Marble Cone Fire, and reopened during the Kirk Complex Fire, fall

inside the wilderness boundary. On Skinner Ridge, or in any other area where a portion of a proposed fuelbreak falls within wilderness, that portion should be subject to the same fuelbreak standards as for designated wilderness, including an MRA.

- 5) Referencing “(2b) Palo Colorado to Big Sur Vicinity –Wilderness “of the Proposed Action:
 - a) The northern approximately 1.2 miles of the historic fireline between Peak 3342 and the South Fork of the Little Sur River features very steep topography. As a consequence, bulldozers have never been utilized there for fireline construction. These 1.2 miles of fireline have always been constructed using hand tools during wildfire, and many of the larger live oaks within this section have already been limbed. Firefighter safety concerns appear to have prevented re-opening this critical fireline during the 2008 Basin Complex Fire. Please consider the northern 1.2 miles of this section of fuelbreak a priority for fuelbreak implementation using hand tools.
- 6) If the MRA determines that administrative action is necessary, fuelbreak design should utilize a fuels prescription where individual segments of the proposed fuelbreaks are identified and appropriate prescriptions developed using the best available science. Segment criteria should include vegetation type and condition, grade and topography, soil type and any other important factors that would differentiate fuelbreak segment types and treatment prescriptions. Identified segments should be individually analyzed during the MRA process to determine the appropriate activity and minimum tool. Any future wilderness fuelbreak maintenance should be subject to a new MRA.
- 7) Fuelbreaks located on non-wilderness lands should be subject to the same design and segment criteria as described above for wilderness, but without the need for an MRA.
- 8) All fuelbreaks should be designed to at least meet the Scenery Management System (SMS) classification of “High”.
- 9) In project areas where it is determined to be appropriate, please consider the use of prescribed fire to create fuelbreaks in a manner that mimics the natural occurrence of wildfire.
- 10) The installation and maintenance of foot trails to access and traverse fuelbreaks should be considered where feasible and appropriate. Portions of these trails may also function as “scratch lines” during wild fire events or prescribed burning. Also, please analyze the effects trails would have on both the efficiency of fuelbreak construction and maintenance, as well as the resource protection they would provide by reducing social trails. Where new trail construction occurs within wilderness, an MRA should be prepared.
- 11) The EIS should identify both the non-wilderness areas and the specific locations within these areas where machine thinning, chipping and mastication would be used. The environmental impacts associated with these methods should be thoroughly analyzed and the results included in the EIS.
- 12) Many of the historic firelines where projects are proposed contain slash piles from prior suppression efforts. The burning methodologies for these slash piles, as well as those that are Project created should be addressed. Please identify the steps that will be taken to mitigate the soil sterilization that would occur as a result of pile burning.

Thank you for the opportunity to comment on the NOI. We look forward to working with you in the future.

Sincerely,

Pam Flick
California Program Coordinator
Defenders of Wildlife

Kristi Davis
Executive Director
California Wilderness Coalition

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Director
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Reply to: Gordon Johnson
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CC:

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Los Padres National Forest
Attn: Peggy Hernandez, Forest Supervisor
6755 Hollister Avenue
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Forest Service, Pacific Southwest Region
Attn: Christina Boston, Wilderness and Wild and Scenic Rivers Program Leader
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