



# COUNTY of VENTURA

## Board of Supervisors

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October 5, 2021

Jennifer Eberlien, Regional Forester  
Pacific Southwest Region, US Forest Service  
1323 Club Drive  
Vallejo, CA 94592

**Re: Opposition to Reyes Peak Forest Health and Fuels Reduction Project;  
Los Padres National Forest.**

Dear Regional Forester Eberlien:

Congratulations on your new position and welcome to California. We look forward to working with you on forest management in our region.

On October 5<sup>th</sup>, the Ventura County Board of Supervisors voted to formally oppose the subject project. Reasons for this action include:

1. By the LPNF's own study, the fuel break would be of negligible value.

The "LPNF Southern Districts Strategic Fuel Break Assessment" ranks the Pine Mountain fuel break as priority No. 150 out of 163 projects. The project receives a "Values at Risk" score of 3 out of a possible 28, and a Wildland-Urban Interface (WUI) score of zero. Were it not for a high "workability" score, the Pine Mtn. fuel break would have received a total score of 3 out of a possible 64, placing it below the lowest-ranked project in the four Ranger Districts.

It is also important to note that the Pine Mtn - Reyes Pk. ridge already has an impregnable fuel break in the form of the paved two-lane width Pine Mountain Road which extends along the length of the project. This road already serves as an absolute fuel break in low-intensity fires and could be augmented with retardant drops. The proposed ridge-top fuel break is recognized as inadequate to stop wind-driven fires and is only expected to contain low-intensity fires; itself a questionable proposition with its likely rapid re-vegetation with highly flammable grasses.

2. Fire Prevention and Fuel Break Resources Would Be Much Better Spent in the WUI

The proposed project lies 3-15 miles outside the WUIs of the nearest communities (the nearest being a remote cabin cluster). Per the LPNF Strategic Fuel Break Assessment,

resources should be allocated to protect these communities most effectively by providing fuel breaks within the WUI. Projects in the WUI provide the dual benefit of protecting communities from forest fires and protecting the forest from community fires.

### 3. LPNF has Disregarded the Economic and Recreation Impacts of the Project

Pine Mtn. is a very high value recreation site for both day use and family camping. It attracts visitors from a multi-county area including Ventura, Santa Barbara, Kern, and Los Angeles Counties who fill the dozens of campsites nearly every weekend of camping season. The project would all but eliminate the recreational value of the area during its construction phase, and the proposed substantial mature tree removal would permanently significantly degrade the most attractive feature of this pristine area.

Pine Mtn. provides many highly popular recreational activities: family camping, hiking, bird and wildlife watching, backpacking, rock climbing, star gazing, cross country skiing, hunting, firewood gathering, and regional trailhead access,

Visitors to Pine Mountain patronize local businesses, particularly in the Ojai Valley and rural gateway communities. Impairing the recreational appeal of Pine Mtn. will economically harm local businesses in gateway communities.

### 4. Significant Environmental impacts, Need for EA

In addition to the recreation resource impacts, biological impacts must be thoroughly addressed through up-to-date biological field studies:

-Rare, threatened, endangered, or locally significant plants, lichens, trees, birds, mammals, and reptiles.

-Unique and significant multi-species habitat.

-Habitat impairment or conversion through direct impacts, maintenance activities, and associated soil desiccation or erosion.

### 5. LPNF Site Assessment and Habitat Evaluation is Fundamentally Flawed

The assertion that the mature trees on Pine Mountain can be improved by removing them is not supported by adequate evidence. LPNF relies on the nearly century-old 1930 broad-scale, and inaccurate tree cover study, and an inappropriate model of forest health. The trees and forest on Pine Mountain have been stable and in balance for many decades and there is no evidence to support that this will not continue to be the case well into the future.

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The percentage of dead trees on Pine Mountain is low compared to most conifer zones in Southern and Central California. Patches of dead trees lead over time to beneficial habitat transition and eventual tree regrowth, all of which are beneficial to various species and part of the ecology of the area and forests generally. Individual dead trees provide important roosting and nesting for birds including the California Condor, as well as habitat for many animals

The assertion that the presence of mistletoe justifies mature tree removal is not supported by local studies and ignores that dwarf mistletoe is a native species that has successfully coexisted with conifers on Pine Mtn. for many centuries. Were mistletoe fatal to the forest, the forest would have disappeared long ago.

6. Project is Inconsistent with Ventura County's Adopted Tree Protection Ordinance

The Ventura County Non-Coastal Zoning Ordinance, Tree Protection Section, strictly limits and regulates the removal of native trees over 23-inches in diameter, which are designated as "Heritage Trees" in our ordinance. The project's unlimited and unrestricted removal of trees over 24-inches in diameter would be grossly inconsistent with the County of Ventura's long-standing efforts to conserve native Heritage Trees.

In conclusion, the Ventura County Board of Supervisors formally opposes the Reyes Peak Forest Health and Fuels Reduction Project. If the project is allowed to move forward, an EA should be completed before project approval. Similar concerns would apply to the Mt. Pinos Forest Health and Fuels Reduction Project.

Cordially,



Linda Parks,  
Chair, Board of Supervisors

CC: Congressman Salud Carbajal, Congresswoman Julia Brownley, Senator Diane Feinstein, Senator Alex Padilla, Forest Service Chief Randy Moore