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LOS PADRES SIERRA CLUB, SANTA BARBARA GROUP · MARGARITA PROUD ·
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OJAI VALLEY GREEN COALITION · OJAI VALLEY LAND CONSERVANCY · QUAIL SPRINGS PERMACULTURE ·
SAN LUIS OBISPO COASTKEEPER · SANTA ANA MOUNTAINS WILD HERITAGE PROJECT ·
SANTA BARBARA AUDUBON SOCIETY · SANTA BARBARA BOTANIC GARDEN · SANTA BARBARA CHANNELKEEPER ·
SANTA BARBARA COUNTY LEAGUE OF CONSERVATION VOTERS · SANTA BARBARA URBAN CREEKS COUNCIL ·
SANTA CLARA RIVER WATERSHED CONSERVANCY · SANTA LUCIA CHAPTER SIERRA CLUB ·
SANTA YNEZ VALLEY ALLIANCE · SANTA YNEZ VALLEY NATURAL HISTORY SOCIETY · SEQUOIA FORESTKEEPER ·
SIERRA CLUB, CONDOR GROUP · SIERRA CLUB, KERN-KAWEAH CHAPTER · VENTANA WILDERNESS ALLIANCE ·
VENTURA AUDUBON SOCIETY · VENTURA CITIZENS FOR HILLSIDE PRESERVATION · VENTURA COASTKEEPER ·
VENTURA HILLSIDES CONSERVANCY · VENTURA SIERRA CLUB · THE WILDLANDS CONSERVANCY ·
WISHTOYO FOUNDATION · WOMEN'S ENVIRONMENTAL WATCH

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]

California Chaparral Institute

Richard W. Halsey, Director
Escondido, CA

rwh@californiachaparral.org

Calif. Native Plant Society, Channel Islands Chapter

David Magney, President
Ojai, CA

president@cnpisci.org

Carpinteria Valley Association

Vera Bensen, President
Carpinteria, CA

v2bensen@yahoo.com

Channel Islands Restoration

Ken Owen, Executive Director
Carpinteria, CA

ken@cirweb.org

Community Hiking Club

Dianne Erskine-Hellrigel, Executive Director
Santa Clarita, CA

zuliebear@aol.com

Conejo Valley Audubon Society

Chrystal Klabunde, Programs Chair
Thousand Oaks, CA

chrystal@conejovalleyaudubon.org

Cuyama Valley Conservancy

Gene Zannon, President
Maricopa, CA

gene@sbpistachios.com

Ecologistics

Stacey Hunt, CEO
San Luis Obispo, CA

stacey@ecologistics.org

ECOSLO – Environmental Center of San Luis Obispo

Kylee Singh, Program Coordinator
San Luis Obispo, CA

programs@ecoslo.org

Environmental Defense Center

Brian Trautwein, Environmental Analyst
Santa Barbara, CA

btrautwein@environmentaldefensecenter.org

Environment in the Public Interest

Gordon Hensley, Executive Director
San Luis Obispo, CA

g.r.hensley@sbcglobal.net

Friends of the Santa Clara River

Ron Bottorff, Chairman
Newbury Park, CA

bottorffm@verizon.net

Gaviota Coast Conservancy

Mike Lunsford, President
Goleta, CA

lunsford4@cox.net

Get Oil Out!

Michael Lyons, President
Santa Barbara, CA

mtlyonslaw@gmail.com

Keep Sespe Wild Committee

Alasdair Coyne, Conservation Director
Ojai, CA

sespe@sespewild.org

Los Padres ForestWatch

Jeff Kuyper, Executive Director
Santa Barbara, CA

info@LPFW.org

Los Padres Sierra Club, Arguello Group

Jerry Connor, Chair
Santa Maria, CA

connor.gd2@verizon.net

Los Padres Sierra Club, Conejo Group

John Holroyd, Chair
Thousand Oaks, CA

backpacker2@earthlink.net

Los Padres Sierra Club, Santa Barbara Group

Jim Childress, Chair
Santa Barbara, CA
jim.childress@lifesci.ucsb.edu

Margarita Proud

Roy Reeves, President
Santa Margarita, CA
margaritaproud@gmail.com

Morro Coast Audubon Society

Mike Stiles, President
Morro Bay, CA
mstiles@calpoly.edu

Naturalist for You

Joel Robinson, Director/Head Naturalist
Silverado, CA
jrobinson@naturalist-for-you.org

North County Watch

Sue Harvey, President
Templeton, CA
info@northcountywatch.org

Ojai Raptor Center

Kimberly Stroud, Executive Director
Ojai, CA
raptorcenter@roadrunner.com

Ojai Valley Green Coalition

Deborah Pendrey, Executive Director
Ojai, CA
coordinator@ojaivalleygreencoalition.com

Ojai Valley Land Conservancy

Greg Gamble, Executive Director
Ojai, CA
greg@ovlc.org

Quail Springs Permaculture

Brenton Kelly, Farm Manager
Maricopa, CA
info@quailsprings.org

San Luis Obispo Coastkeeper

Gordon Hensley, Executive Director
San Luis Obispo, CA
coastkeeper@epicenteronline.org

Santa Ana Mountains Wild Heritage Project

Joel Robinson, Outreach Coordinator
Silverado, CA
joel@santaanamountains.org

Santa Barbara Audubon Society

Darlene Chirman, President
Santa Barbara, CA
President@SantaBarbaraAudubon.org

Santa Barbara Botanic Garden

Dieter Wilken, Director of Conservation
Santa Barbara, CA
dwilken@sbbg.org

Santa Barbara Channelkeeper

Kira Redmond, Executive Director
Santa Barbara, CA
kira@sbck.org

Santa Barbara Co. League of Conservation Voters

Greg Helms, President
Santa Barbara, CA
ghhelms@gmail.com

Santa Barbara Urban Creeks Council

Eddie Harris, President
Santa Barbara, CA
eharris@silcom.com

Santa Clara River Watershed Conservancy

Dianne Erskine-Hellrigel, President
Newhall, CA
info@svgreen.org

Santa Lucia Chapter Sierra Club

Greg McMillan, Chair
San Luis Obispo, CA
santa.lucia.chapter@sierraclub.org

Santa Ynez Valley Alliance

Mark Oliver, President

Santa Ynez, CA

info@santaynezvalleyalliance.org

Santa Ynez Valley Natural History Society

Ken Doud, President

Los Olivos, CA

synature@west.net

Sequoia ForestKeeper

Ara Marderosian, Executive Director

Kernville, CA

ara@sequoiaforestkeeper.org

Sierra Club, Condor Group

Mary Ann Lockhart, Chair

Pine Mountain Club, CA

jmal@frazmtn.com

Sierra Club, Kern-Kaweah Chapter

Stephen A. Montgomery, Chair

Bakersfield, CA

samonty@pacbell.net

Ventana Wilderness Alliance

Mike Splain, Executive Director

Santa Cruz, CA

mike@ventanawild.org

Ventura Audubon Society

Bruce Schoppe, President

Ventura, CA

bschoppe6698@sbcglobal.net

Ventura Citizens for Hillside Preservation

Diane Underhill, President

Ventura, CA

dunderhill@sbcglobal.net

Ventura Coastkeeper

Jason Weiner, Associate Director & Staff Attorney

Ventura, CA

jweiner.venturacoastkeeper@wishtoyo.org

Ventura Hillside Conservancy

Derek Poultney, Conservation Manager

Ventura, CA

dpoultney@venturahillside.org

Ventura Sierra Club

Jon Ziv, Leadership Team Chair

Ventura, CA

chair@venturasierraclub.org

The Wildlands Conservancy

Dan York, Associate Director

Oak Glen, CA

Dan.Y@TWC-CA.org

Wishtoyo Foundation

Mati Waiya, Exec. Dir. & Chumash Ceremonial Elder

Ventura, Santa Barbara, and San Luis Obispo, CA

matiwaiya@wishtoyo.org

Women's Environmental Watch

Cathie McHenry, President

Solvang, CA

info@we-watch.org