



March 31, 2010

Marian Kadota
Adaptive Management Services Enterprise Team
U.S. Forest Service
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Re: Initial Comments on the Mount Laguna and Pine Valley Community Defense and Healthy Forest Restoration Project

Dear Ms. Kadota:

Thank you for the opportunity to provide initial comments on the Mount Laguna and Pine Valley Community Defense and Healthy Forest Restoration Project (Mount Laguna / Pine Valley project).

The California Chaparral institute strongly supports project goals to reduce the fire hazard near communities, rural residences, evacuation routes, and other infrastructure. Treatment activities in the Forest Service's "Developed Area Interface Land Use Zone" should be considered the highest project priority and implemented before all other proposed activities.

The following recommendations should be incorporated and fully analyzed in a stand alone "Fire Safety and Conservation Alternative" in any NEPA and/or Healthy Forest Restoration Act documents for the Mount Laguna / Pine Valley project.

Please note that the term "chaparral vegetation" is used in these comments to refer to areas that are clearly dominated by any shrub species. The term "conifer forest vegetation" is used to refer to areas that are clearly dominated by conifer trees. Chaparral vegetation with the occasional scattered conifer tree should be considered chaparral vegetation and should be managed for the benefit of chaparral ecology, not for the protection of isolated conifers.

1. Implement effective vegetation treatments to protect the public, firefighters, and private property

For the purposes of fire suppression to protect public and firefighter safety and private property, vegetation treatment and fuels reduction activities should take place only within the actual

wildland/urban interface, identified by the Forest Service as the "Developed Area Interface Land Use Zone" in the Land Management Plan - Part 2 Cleveland National Forest Strategy. Vegetation treatment and fuels reduction activities may also be appropriate along limited, designated, and strategic evacuation and fire access roads.

Vegetation management and fuel reduction activities in these areas in chaparral vegetation should be carried out consistent with California state law (Public Resources Code 4291). Specifically, break up vegetation fuel continuity within a maximum of 100 feet of structures with few exceptions for extreme conditions such as steep slopes. Thin vegetation immediately adjacent to structures, and remove weeds at least annually from treated areas. Examine structures themselves and suggest retrofits to reduce the chance of ignition from embers.

The Chaparral Institute will vigorously oppose unfounded chaparral treatments as measured from the boundary of National Forest land instead of structures.

The Forest Service must anticipate the inevitable problem of colonizing exotic invasive weeds and grasses as a part of the Mount Laguna / Pine Valley project and include a long-term plan for at least annual treatment of weed infestations. Deferring this crucial project element to a future project or decision will greatly increase the risk of harmful wildlife to both people and chaparral and forest vegetation.

The Forest Service also should not encourage expansion of existing type-converted areas previously created by the agency immediately east of Pine Valley within the proposed project boundaries by burning or masticating mature chaparral vegetation adjacent to converted areas. Instead, focus vegetation treatments in this area solely within the Developed Area Interface Land Use Zone and within 100 feet of structures.

2. Provide grants and otherwise encourage homeowners in Mount Laguna and Pine Valley to improve fire safety – Reduction of vegetation and landscaping fuels near structures and retrofitting homes with fire resistant materials
3. Protect valuable chaparral vegetation
 - Eliminate proposed prescribed fire treatments in chaparral vegetation so as to retain the unique and valuable stands of this natural community in the project area and to reduce future fire risk from highly flammable, colonizing exotic weeds and grasses. Environmental review documents should consider the high likelihood of a wildfire within treated areas prior to full recovery of chaparral vegetation and the resulting likelihood of harmful type conversion;
 - Bar use of mechanized masticators and other heavy equipment outside of the designated Developed Area Interface Land Use Zone and on any slopes exceeding 20 percent grade;

- Apply only one primary treatment to chaparral vegetation (i.e. mastication OR broadcast burning) to reduce the likelihood of type conversion;
 - Retain all monarch shrub specimens where any portion of the stalk is 6 inches or greater in diameter;
 - Suspend cattle grazing in treated areas to limit the spread of weeds and facilitate ecological recovery, and;
 - Anticipate, monitor, and provide for perpetual treatment of weed infestations anywhere within the project area using hand tools and hand-held power tools.
4. Implement beneficial vegetation treatment to protect conifer forests
- Retain all larger diameter trees and snags greater than 14 inches diameter at breast height (dbh). Environmental review documents should address the scientific literature showing that wildfire may burn hotter, kill more trees, and be a greater threat to lives and property in areas where conifer tree density and canopy has been overly thinned;
 - Selectively thin and remove conifers less than 14 inches dbh and shrubs less than 6 inches (at largest diameter of stalk) in and around conifer forest vegetation using hand tools or hand-held power tools. Retain all oak species where any portion of the stalk is 6 inches or greater in diameter. After initial thinning treatments use prescribed fire for maintenance in accordance with the natural fire regime;
 - Chaparral patches inside areas otherwise dominated by conifer forest vegetation should be retained at a level roughly consistent with the amount of chaparral patch located outside of the drip line of conifers;
 - Selectively remove actual hazard trees near homes, along limited/designated/strategic fire evacuation and access roads, and recreation areas. However, given extensive past and ongoing removal of hazard trees and snags around Mount Laguna, all larger diameter snags greater than 14 inches dbh should be retained away from homes, fire access roads, and recreation areas;
 - Bar use of mechanized masticators and other heavy equipment outside of the Developed Area Interface Land Use Zone and on any slopes exceeding 20 percent grade;

- Suspend cattle grazing in treated areas to limit the spread of weeds and facilitate ecological recovery. Environmental review documents should address the conclusions of scientific literature that cattle grazing encourages unnaturally dense conifer forest vegetation, and;
- Anticipate, monitor, and provide for perpetual removal of weed infestations anywhere within the project area using hand tools and hand-held power tools.

5. Implement specific California spotted owl protection measures

- Treat modeled or past recorded occupied California spotted owl habitat as occupied for the purposes of identifying vegetation treatments. For example, the La Posta Creek headwaters spotted owl territory should be treated as occupied for the purpose of identifying vegetation treatments in Mount Laguna / Pine Valley project units 12 and 35;
- Prohibit treatments in California spotted owl nest stands outside the Developed Area Interface Land Use Zone;
- In California spotted owl Protected Activity Centers outside the Developed Area Interface Land Use Zone, retain all trees greater than 9 inches and snags greater than 12 inches. Please note that Mexican spotted owl PACs have a 9 inch diameter limit, and that the 2001 Sierra Framework California spotted owl PACs had a 6 inch limit when mechanical treatments were determined to be absolutely necessary (mechanical treatments in PACs were discouraged). For PAC stands with canopy cover over 70%, do not reduce to below 70%. For stands with canopy cover between 50% and 70%, do not reduce to below 50%;
- In California spotted owl Home Range Cores outside the Developed Area Interface Land Use Zone, retain all trees greater than 12 inches and snags greater than 14 inches. For stands with canopy cover over 50%, do not reduce to below 50%. For stands with canopy cover between 40% and 50%, do not reduce to below 40%, and;
- Prohibit tree cutting and other proposed treatment activities in any California spotted owl habitat during the breeding season.

6. Implement other resource conservation measures

- Do not treat Riparian Conservation Areas outside the Developed Area Interface Land Use Zone;
- Prior to treatment identify suitable habitat and conduct surveys (to protocols where available) for all other Endangered, Threatened, Candidate, and Regional Forester's Sensitive species as

well as sensitive species identified in the California Natural Diversity Data Base and by the California Native Plant Society. Do not treat occupied habitat for these species outside of the Developed Area Interface Land Use Zone;

- Collect and present population trend data on any Management Indicator Species in any NEPA documentation, and;
- Flag and avoid any areas within 33 feet (10 meters) of downed logs, rocky outcrops, boulders, pack rat middens, and brush piles. Trees should not be felled across rocky outcrops or downed logs.

7. Support full public participation and environmental review

- Do not undermine public participation and environmental review of the Mount Laguna / Pine Valley project by processing the project under the Healthy Forest Restoration Act.

8. Disclose and analyze cumulative effects

- Fully disclose and analyze the cumulative environmental effects of the Mount Laguna / Pine Valley project alongside ongoing related activities such as fuels / vegetation management, hazard tree removal, and cattle grazing in the project area by the Forest Service, CalFire, the County of San Diego, private property owners, and others, and;
- Prepare a Cleveland National Forest-wide fire and vegetation management plan and environmental impact statement.

Thank you for your consideration. Please contact David Hogan with any questions at 760 809-9244.

Sincerely,



David Hogan
Board Member
California Chaparral Institute