

SANTA MONICA MOUNTAINS CONSERVANCY

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August 11, 2004

Southern California Forest Plan Revisions
Forest Managers,
Angeles National Forest and Los Padres National Forest
USDA Forest Service Content Analysis Center
P.O. Box 22777
Salt Lake City, Utah 84122

**Comments on National Forest Land Management Plans and
Draft Environmental Impact Statement**

Dear Forest Managers:

The following comments were prepared by staff of the Santa Monica Mountains Conservancy (Conservancy) and are subject to the official approval of the Conservancy board at the upcoming meeting of August 30, 2004. We anticipate that a letter of confirmation, signed by the Chairperson, will be sent to the U.S. Forest Service after that meeting. We ask that you please consider the following comments until that time.

The Conservancy offers the following comments on Southern California National Forest Land Management Plans and accompanying Draft Environmental Impact Statement (DEIS). The Conservancy's mission is to strategically buy back, preserve, protect, restore, and enhance treasured pieces of Southern California to form an interlinking system of urban, rural, and river parks; open space; trails; and wildlife habitats that are easily accessible to the general public.

Portions of the Angeles National Forest lie within the Rim of the Valley Trail Corridor, which is a portion of the Conservancy's jurisdiction. The Conservancy and the Forest Service are partners in a Memorandum of Understanding for cooperative activities in the Rim of the Valley Trail Corridor. Numerous habitat linkages and wildlife movement corridors connect the Angeles National Forest to Los Padres National Forest and to other core habitat areas of interest to the Conservancy. For example, the San Gabriel Mountains portion of the Angeles National Forest provides connectivity westward across State Route 14 (SR-14) into the Santa Susana Mountains, and across Interstate 5 (I-5) to Los Padres National Forest. The San Gabriel Mountains portion of the Angeles National Forest also connects southward to core habitat in the Verdugo Mountains. Los Padres National Forest

Southern California Forest Plan Revisions

August 11, 2004

Page 2

also provides connectivity southward to the Santa Clara River, then to the Santa Susana Mountains, the Simi Hills, and to the Santa Monica Mountains. The Missing Linkages report (SCWP 2000) identifies these and other important wildlife movement areas and habitat linkages. The Missing Linkages effort is a collaborative effort among numerous land managers and planners, conservationists, and top scientists to identify the locations of, and threats to, the most important movement corridors for California's wildlife.

The Conservancy and its joint powers partner, the Mountains Recreation and Conservation Authority, own land in many of these core habitat and habitat linkage areas. The ecological health of these areas are dependent on the ecological health of these national forests. In this letter, we focus our comments to those aspects of the DEIS related to the Angeles National Forest, with some limited comments related to wilderness areas in Los Padres National Forest.

The Conservancy supports many of the goals of the Southern California National Forests Vision including: Goal 2: Reduce the impacts from invasive species, Goal 3: Provide outdoor recreational activities, Goal 5: Improve watershed condition, and Goal 6: Mission related work in addition to that which supports the agency goals.

The Conservancy also supports many of the strategies and tactics in the Angeles National Forest Strategy designed to protect biological resources, and to promote recreation compatible with protection of those resources. The attachment accompanying this letter lists just a few of those that the Conservancy supports.

The ultimate alternative chosen by the Forest Service must ensure that these strategies and tactics are implemented and the forest goals are met. Specifically, of those alternatives presented in the DEIS, alternatives 3 and 6, or some combination of the two, would provide the greatest likelihood of meeting those goals. The Conservancy supports designation of additional wilderness areas, as well additional backcounty non-motorized areas.

The Conservancy has previously supported the California Wild Heritage Campaign and the Federal designation of the Rim of the Valley, Magic Mountain, Condor Peak, and Strawberry Peak areas in Angeles National Forest as wilderness. The Conservancy also supported the Federal designation of several proposed additions to the Sespe Wilderness Area in Los Padres National Forest. Those proposed additions are: Boulder, Chorro Grande, Beaver, Fishbowls, Thorn, and Stonehouse. In addition, the Conservancy recommends that the final preferred alternative incorporate those areas recommended for wilderness in the Angeles National Forest and Los Padres National Forest proposed in both Alternative 3 and in Alternative 6 in "Los Padres South."

Southern California Forest Plan Revisions

August 11, 2004

Page 3

To clarify, in general, the Conservancy supports increased recreational opportunities in natural areas, such as on Forest Service land, but not when they disrupt existing sensitive natural resources. These increased recreational opportunities can include activities such as hiking and camping. To that end, the Conservancy does not support the preferred alternative for the Angeles National Forest, Alternative 4. Activities such as off road motorized vehicles should not be expanded and motorized back country areas should not be expanded in the forest. However, the Conservancy notes that some back country roads should remain open to ensure adequate access for fire protection in any alternative.

To that end, the Conservancy does not support the Strategy, "Trans 4," for the Angeles National Forest regarding improving off-highway vehicle opportunities and facilities for highway licensed and non-highway licensed vehicles. However, if the Forest Service chooses to retain the language of this strategy, the following underlined language should be added to the text in Part 2-the Angeles National Forest Strategy, Land Management Strategy:

Trans 4: Off-Highway Vehicle Opportunities. Improve off-highway vehicle opportunities and facilities for highway licensed and non-highway licensed vehicles, only where they are found to be strongly compatible with the protection of existing sensitive biological resources.

- In conjunction with the designation of low maintenance standard roads (and where applicable, open areas), develop motorized trails that address the needs of off-highway vehicle enthusiasts, only where they are found to be strongly compatible with the protection of existing sensitive biological resources.

The Place Based Program Emphasis descriptions should emphasize the importance of the Angeles National Forest as part of wildlife movement areas from the San Gabriel Mountains east of SR-14, across SR-14 and I-5, to Los Padres National Forest west of I-5, and that these specific areas should be managed to protect those values. The following text should be added to the program emphasis for Soledad Front Country:

Management is expected to focus on the protection of communities from the threat of fire, the management of high levels of recreation use, ~~and~~ the maintenance of urban and forest infrastructure (facilities), and the protection of wildlife corridors.

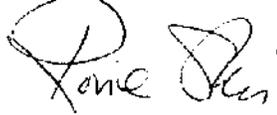
Southern California Forest Plan Revisions
August 11, 2004
Page 4

Similar type of language should be included in the text for The Front Country, as well as the other Places in the Plan. Also, specifically within the description for the Front Country, habitat linkages and wildlife movement connections to the Verdugo Mountains should be emphasized.

The Conservancy supports the Forest Service's attempts to incorporate measures in Appendix G-DRAFT- Guidelines for Construction, Maintenance and Operation of Mountain Top Communication Sites to protect migratory birds, and threatened and endangered species.

Thank you for the opportunity to comment. Please contact Judi Tamasi of our staff at (310) 589-3200, ext. 121 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Rorie Skei". The signature is written in a cursive, flowing style with a large initial "R".

RORIE SKEI
Chief Deputy Director

Literature cited

South Coast Wildlands Project (SCWP). 2000. Missing Linkages: Restoring Connectivity to the California Landscape-Conference Proceedings. November 2. San Diego Zoo, San Diego, California.

Attachment

The Santa Monica Mountains Conservancy (Conservancy) supports many of the strategies and tactics in the Angeles National Forest Strategy. The following are just a few of those that the Conservancy supports.

- WL 1: Imperiled Species Management. Maintaining or improving habitat conditions for wildlife, fish and plant species.
- WL 1: Imperiled Species Management. Establish and maintain a working relationship with county planning to insure coordination on development projects within the county.
- WL 2: Management of Species of Concern. Strategy: Education/Information/Interpretation. Habitat fragmentation, species linkages and corridors and biological diversity.
- WL 2: Management of Species of Concern. Strategy: Survey/Inventory/Increase Knowledge Base. Riparian and Aquatic Species, Species with limited distribution, Terrestrial species.
- WL 2: Management of Species of Concern. Strategy: Habitat Protection. Proposed project planning, Coordination with other agencies, Habitat acquisition, Restricted human access during critical life stages, Prevent the spread of invasive nonnative species.
- IS 1: Invasive Species Prevention and Control. Prevent the introduction of invasive species and coordinate the treatment of invasive species across jurisdictional boundaries.
- WL 4: Wildlife, Fish and Rare Plants Habitat Management. Monitor the habitat for ecological health indicators (e.g. Arundo, tamarisk and bullfrogs).
- Lands 1: Strategic Acquisition. Work with land conservancies, local government, and others to secure long-term habitat linkages.
- Link 1: Habitat Linkage Planning. Manage forest use and activities to be compatible with maintaining habitat linkages.
- Link 1: Habitat Linkage Planning. Actively participate with local government, developers, and other entities to protect forest values at intermix and interface zones.
- WAT 1: Watershed Function. Restore, maintain and improve watershed conditions.
- REC 3: Recreation Participation. Offer a wide range of high quality, environmentally sustainable developed and dispersed recreation opportunities to a rapidly growing and culturally diverse visitor population, with minimal visitor conflicts and effects to other resources.
- REC 4: Conservation Education. The Forest Service plays a leadership role in the development of strong, well-supported conservation education partnership.
- Trans 3: Improve Trails. Develop an interconnected, shared-use trail network and support facilities that complement local, regional and national trails and open space, and that also enhance day use opportunities and access for the general public.