Input 21

National Park Service
401 W. Hillcrest Dr.
Thousand Oaks, CA 91360
Attn: Fire Management Plan comments

Sept. 10, 2004

Dear NPS:

1. I am a resident of Los Angeles who values and enjoys the native beauty and health of the ecosystem in the Santa Monica Mountains National Recreation Area. I recognize that as a US citizen, these are my lands, and I am here speaking out for their protection and preservation at the same time that human lives and homes are protected from wildfires at the wild/urban interface.

2. I understand that the NPS has a dual mandate - to accomplish BOTH of these goals. Wildland fire management objectives are to be DERIVED FROM natural resource management plans. NPS must not make policy contrary to this charge – to do so would betray the trust of the American people, who delegate to NPS this responsibility. NPS must not sacrifice the objective of preserving the viability of the ecosystem to accomplish the objective of reducing fire-risk.

3. I am aware of the NPS FMP Preferred Alternative 2, which includes Suppression, Mechanical Fuel Reduction, Strategic Fuels Treatment, and Ecological Prescribed Fire. This alternative, and these practices can irreparably fragment, degrade, and damage our native environment, until it is gradually type-converted to an exotic landscape. Many species, plant and animal communities, and ecological processes (the importance of which are still unmeasured) can be lost. See guidelines specified by NEPA, CNPS, and your instructions from Reference Manual -18 to 'use least intrusive and least resource-damaging methods to manage wildland fire'. See also the supporting data compiled by the expert botanists, ecologists, and wildfire specialists of this DRAFT FMP. The alternatives presented do not state that the NPS will comply with these standards and recommendations.

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Input 21 continued

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10. How will the viability of species, plant and animal communities, and ecological processes be assessed?

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12. Can the NPS fund post-fuels treatment rehabilitation as required in the NPS Reference Manual –18?

13. It is understandable, if only because the occurrence of fires has increased beyond a natural level, that the existing policy of Landscape Mosaic Prescribed Burning (Alternative 1) is out-dated. NPS also recognizes that periodic burning can invite weed invasion, leading to type-conversion. Why then, propose additional prescribed burns in Alternatives 2 and 3?

14 Using 'equipment' to gain access to interior park areas, and to 'reduce the biomass' there, will have greater adverse effects than the 'adverse' effects caused by repeated burns Natural fire is an integral and necessary part of rejuvenation in our ecosystem. In healthy ecosystem, it has no truly adverse effects But the proposed mechanical disturbances in our fragile mountain environment, would initiate a chain of events that could not be controlled: the soil structure and seedbed would be lost; the land would be vulnerable to weeds, erosion and instability, run-off would accumulate, and watershed flows would be exacerbated and unpredictable. Species composition would change, and

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15. What evidence does NPS have of the resilience of the ecosystem to the measures it proposes?

16. Would it not be wise and responsible to leave intact the untrammeled areas that are the last places these species, communities and processes can exist in their own balance, and to keep them whole and healthy?

17 While we understand environmental changes to occur naturally, we would not be the cause of them, in this last bit of native environment in two highly populated counties. Does the NPS understand and validate this environmental ethic?

18. It is the natural environment that provides sanctuary for the human soul; we would not see it violated, or traded, for a very slightly improved chance of our own safety during a fire, when properly maintaining defensible space around our homes, and proven fire suppression techniques have been shown to provide sufficient protection.

19 It is not sensible to create staging areas that will fragment and endanger the ecosystem, for the eventuality of fighting a fire which may not even occur close to that area, when staging areas could be made in optimal locations if and when necessary, during a fire event.

20. To bulldoze into the heart of the ecosystem, and remove 'fuel', when the courses of fires are largely unpredictable, is counter to our priorities and values. We would only cause damage when there is an immediate and clear threat to our lives. In the final analysis, we can evacuate, and we can rebuild, but the land could never recover from these proposed management practices. The character and integrity of our personal natural world - one reason we choose to live here - could be irretrievably lost.

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23. These statements clearly show that the NPS cannot and will not be responsible for the consequences of the measures it intends to implement. It will not even define its own decision-making process.

24. The NPS FMP admits that environmental impacts, of unknown magnitude, are expected; and 'benefits' may not occur. The 'benefits' referred to are 1) an increase in fire rotation intervals, and 2) the ability to more effectively control the spread of a wildfire. It is correct to predict these benefits may not occur, because it has been shown that young chaparral, and degraded ecosystems burn as readily as old-growth chaparral. Fire rotational intervals cannot be ascribed just to age of vegetation. Furthermore, reducing some acres of 'fuel' slows down a fire only when there is little or no wind – which is not typically the case in our environment during fire season. Would prescribed burns be done in the Spring – the time most damaging to the ecosystem?

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26. With what little native landscape remains to us, and our growing population increasingly in need of, and appreciative of wilderness, will NPS put the environment's inestimable value before NPS's own management convenience, and do less, rather than more fuel reduction?

27. Would it not be wiser to wait until studies are done, rather than 'not consider if not studied'? To limit what one will consider, when crucial data is missing that can be had; to deliberately destroy what one wants to preserve; to prematurely formulate policy that one knows can do unforeseen damage to oneself – surely this demonstrates the first definition of stupidity. To impose such decisions on everyone else is unconscionable.

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30. Will the NPS include in the FMP a description of the goal-state of the ecosystem in their charge? This should recognize the free and dynamic health the ecosystem has, and how NPS, through its FMP, will enable this entity to thrive with integrity.

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Thank you for your attention to these concerns.

Sincerely,

Karen Clausen

818 874 9503

Input 22

"Mary Pelletier"
<mkpell@earthlink.net>
09/15/2004 10:25 PM
MST

To: <samo_fire@nps.gov>
cc:
Subject: Possibly Spam: letter to NPS

by e-mail

RECEIVED
SEP 15 2004
SMMNRA-8540

National Park Service

401 W. Hillcrest Dr.

Thousand Oaks, CA 91360

Attn: Fire Management Plan comments

Sept. 15, 2004

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Thank you for your attention to these concerns. Yours truly,

Mary K. Pelletier

660 Brooktree Road

Santa Monica CA 90402

Input 23

National Park Service
401 W. Hillcrest Dr.
Thousand Oaks, CA 91360
Attn: Fire Management Plan comments

2004 SEP 16

Sept. 13, 2004

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Katherine Glascock

Katherine Glascock
4503 Radford Avenue
Studio City, CA 91607-4136

Input 24

FRANCES E. KNIGHT & ASSOCIATES LANDSCAPE ARCHITECTURE
1386 MONUMENT ST. PACIFIC PALISADES, CALIFORNIA 90272 310 454-6746

National Park Service
401 W. Hillcrest Dr.
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2. I understand that the NPS has a dual mandate - to accomplish BOTH of these goals. Wildland fire management objectives are to be DERIVED FROM natural resource management plans. NPS must not make policy contrary to this charge – to do so would betray the trust of the American people, who delegate to NPS this responsibility. NPS must not sacrifice the objective of preserving the viability of the ecosystem to accomplish the objective of reducing fire-risk.

3. I am aware of the NPS FMP Preferred Alternative 2, which includes Suppression, Mechanical Fuel Reduction, Strategic Fuels Treatment, and Ecological Prescribed Fire. This alternative, and these practices can irreparably fragment, degrade, and damage our native environment, until it is gradually type-converted to an exotic landscape. Many species, plant and animal communities, and ecological processes (the importance of which are still unmeasured) can be lost. See guidelines specified by NEPA, CNPS, and your instructions from Reference Manual -18 to 'use least intrusive and least resource-damaging methods to manage wildland fire'. See also the supporting data compiled by the expert botanists, ecologists, and wildfire specialists of this DRAFT FMP. The alternatives presented do not state that the NPS will comply with these standards and recommendations.

4. **ALTERNATIVE 2 CONTERMANDS THE MANDATE, AND FIRST OPERATIONAL POLICY OF DIRECTOR'S ORDER #18: 'TO PROTECT PARK RESOURCES AND NATURAL ECOLOGICAL PROCESSES'.** In point of fact, the NPS, in drafting this proposed FMP, has replaced this goal (which is in DO # 18, the second highest goal (after protecting firefighter and public safety) with the goal to: 'reduce fire hazards..' Considering that chaparral and coastal sage scrub plant communities are inherently highly flammable, this stated intention of the NPS, displays the one-sided, negative view of the ecosystem that drives NPS policy-making.

Input 24 continued

5. Why does the NPS not adopt the most expert findings of the California Native Plant Society (CNPS Botanical Survey Guidelines)?

6. Why does the NPS disregard the conservation ethics expressed in The Future of California Floristics and Systematics: Collecting Guidelines and Documentation Techniques, by Ferren, W.R., Jr., D.L.Magney, and T.A. Scholars, 1995?

7. How does the FMP integrate the mission goals of the General Management Plan for the SMMNRA?

8. Have Botanical Surveys been conducted in the areas considered for Strategic Fuel Modification?

9. What factors, besides the output of the computer-modeling program, will be used to designate Strategic Treatment Areas?

10. How will the viability of species, plant and animal communities, and ecological processes be assessed?

11. How will environmental, cost/benefit, and risk/benefit analyses be made, before a Strategic Treatment Project is authorized?

12. Can the NPS fund post-fuels treatment rehabilitation as required in the NPS Reference Manual –18?

13. It is understandable, if only because the occurrence of fires has increased beyond a natural level, that the existing policy of Landscape Mosaic Prescribed Burning (Alternative 1) is out-dated. NPS also recognizes that periodic burning can invite weed invasion, leading to type-conversion. Why then, propose additional prescribed burns in Alternatives 2 and 3?

14. Using 'equipment' to gain access to interior park areas, and to 'reduce the biomass' there, will have greater adverse effects than the 'adverse' effects caused by repeated burns. Natural fire is an integral and necessary part of rejuvenation in our ecosystem. In healthy ecosystem, it has no truly adverse effects. But the proposed mechanical disturbances in our fragile mountain environment, would initiate a chain of events that could not be controlled: the soil structure and seedbed would be lost; the land would be vulnerable to weeds, erosion and instability; run-off would accumulate, and watershed flows would be exacerbated and unpredictable. Species composition would change, and

populations would be affected. Ecological processes, which support not only the ecosystem, but all life, including our own, such as sustainability, the water cycle, air quality, and climate control would be affected.

15. What evidence does NPS have of the resilience of the ecosystem to the measures it proposes?

16. Would it not be wise and responsible to leave intact the untrammeled areas that are the last places these species, communities and processes can exist in their own balance, and to keep them whole and healthy?

17. While we understand environmental changes to occur naturally, we would not be the cause of them, in this last bit of native environment in two highly populated counties. Does the NPS understand and validate this environmental ethic?

18. It is the natural environment that provides sanctuary for the human soul; we would not see it violated, or traded, for a very slightly improved chance of our own safety during a fire, when properly maintaining defensible space around our homes, and proven fire suppression techniques have been shown to provide sufficient protection.

19. It is not sensible to create staging areas that will fragment and endanger the ecosystem, for the eventuality of fighting a fire which may not even occur close to that area, when staging areas could be made in optimal locations if and when necessary, during a fire event.

20. To bulldoze into the heart of the ecosystem, and remove 'fuel', when the courses of fires are largely unpredictable, is counter to our priorities and values. We would only cause damage when there is an immediate and clear threat to our lives. In the final analysis, we can evacuate, and we can rebuild, but the land could never recover from these proposed management practices. The character and integrity of our personal natural world - one reason we choose to live here - could be irretrievably lost.

21. I think the FMP should reflect the willingness and preparedness of the NPS, to assume the role of stewardship of the SMMNRA with which it is entrusted. Nowhere does the plan state that the NPS will be responsible for measures to restore areas that it impacts. Will the NPS bind itself to its responsibility in mitigation efforts?

22. I would like to quote the rationale of the NPS to accept environmental impacts, in choosing the 'environmentally preferred' Alternative 2:

Input 24 continued

[1] The impacts on non-native species from strategic fuels reduction are unknown and will need to be evaluated with project specific environmental analysis.
[2] Benefits would occur on a landscape level if the technique were successful in limiting the amount of area burned, thereby increasing the fire rotation interval with more effective control of fire spread.
[3] Adverse impacts to the areas of treated vegetation would be expected from either mechanical clearing or a high frequency prescribed fire return interval.

23. These statements clearly show that the NPS cannot and will not be responsible for the consequences of the measures it intends to implement. It will not even define its own decision-making process.

24. The NPS FMP admits that environmental impacts, of unknown magnitude, are expected; and 'benefits' may not occur. The 'benefits' referred to are 1) an increase in fire rotation intervals, and 2) the ability to more effectively control the spread of a wildfire. It is correct to predict these benefits may not occur, because it has been shown that young chaparral, and degraded ecosystems burn as readily as old-growth chaparral. Fire rotational intervals cannot be ascribed just to age of vegetation. Furthermore, reducing some acres of 'fuel' slows down a fire only when there is little or no wind – which is not typically the case in our environment during fire season. Would prescribed burns be done in the Spring – the time most damaging to the ecosystem?

25. To claim that the adverse effects from mechanically 'treating' vegetation, and from burning vegetation are equivalent, or that one impact is as bad as another, is disastrously erroneous, irresponsible, and foolhardy. Broad-stroke wishful thinking like this has no place in today's environmental policy-making. Heavy-handed programs like this haven't successfully preserved ecosystems anywhere. Site-by-site analysis and careful hand work is required for any and all projects.

26. With what little native landscape remains to us, and our growing population increasingly in need of, and appreciative of wilderness, will NPS put the environment's inestimable value before NPS's own management convenience, and do less, rather than more fuel reduction?

27. Would it not be wiser to wait until studies are done, rather than 'not consider if not studied'? To limit what one will consider, when crucial data is missing that can be had; to deliberately destroy what one wants to preserve; to prematurely formulate policy that one knows can do unforeseen damage to oneself – surely this demonstrates the first definition of stupidity. To impose such decisions on everyone else is unconscionable.

28. Does NPS have the right to risk depriving future generations of our natural heritage in designated National Park land, without public consensus?

Input 24 continued

29. Alternative 4, which calls for fuel reduction only around existing homes would be an acceptable policy, if 1) it were to state the distance from the flammable structure to undisturbed wildland to be no more than 100 ft. (greater distances have not been shown to significantly reduce fire-risk to structures); and 2) if it were to state that each site would be knowledgeably and sensitively managed to preserve and enhance the health and well-being of that environment in a fire-safe way.

30. Will the NPS include in the FMP a description of the goal-state of the ecosystem in their charge? This should recognize the free and dynamic health the ecosystem has, and how NPS, through its FMP, will enable this entity to thrive with integrity.

31. Interior parklands are the last refuge for the declining pollinator base of our region. Will herbicides and pesticides be used?

32. Will NPS be responsible for restoration, revegetation, and monitoring of impacted areas? How will the native seedbed be replaced?

33. What will be done to prevent erosion and resulting soil loss? What measures will control run-off? How will mass movement be prevented?

34. Will exotic species be introduced?

35. Will discing be used? Will trails and roads be made? Will they become available for off-road vehicle use? Will these areas be opened to organized recreational opportunities?

36. Does the US Government have future goals that this policy may facilitate? Like drilling for gas or oil in the SMMNRC, or introducing exotic plants for harvesting? Or development?

37. Will Eucalyptus and Pine be removed?

38. What will be done to prevent the spread of weeds and invasive exotic plants?

39. How does the cost of the proposed FMP compare with the cost of super-scooper helicopters?

Thank you for your attention to these concerns.

Sincerely,

Frances Knight

Santa Monica Mountains National Recreation Area Response to Input

1) It is acknowledged that a permit may be required for any activity that may impact waters of the United States by way of fill material or construction equipment.

2) If only air quality impacts are considered, then the use of prescribed fire may produce a higher level of air pollutants than mechanical treatments. However projects must consider the relative impacts and benefits of a particular treatment method on the entire range of environmental factors affecting a particular project. Some beneficial fire effects can not be duplicated by mechanical treatment e.g. generation of a postfire nutrient pulse, germination stimulation of native species, weed seed kill etc. Mechanical treatments may have adverse impacts that would not occur as readily with prescribed fire e.g. soil disturbance on steep slopes, promotion of weed spread, etc. All proposed prescribed burn projects are subject to rigorous scrutiny of air quality impacts and no project would move forward unless it meets all local air quality standards.

3) Alternative 2 includes the analysis of mechanical fuel modification for strategic fuel reduction. Alternative 2 states that strategic fuel modification may be accomplished by either prescribed fire OR mechanical methods. The choice would depend on the result of a required environmental review, including air quality effects. All ecological prescribed burns are analyzed for air quality impacts and alternatives to meet the ecological objectives are considered, including mechanical fuel reduction. Alternative 4 does analyze a mechanical fuel modification only alternative that was rejected as an environmentally inferior alternative (p. 4-86).

4) Air quality impacts of other criteria pollutants for each alternative are given in the following summary table.

	Pounds of Emissions				
TREATMENTS	PM10	PM2.5	CO	VOCs	NOX
ALTERNATIVE 1 Landscape Mosaic Burning	1,028	720	9,967	451	159
ALTERNATIVE 2 Strategic Prescribed Burning	103	72	997	45	16
ALTERNATIVE 2, 3 Ecological Prescribed Burning	7	5	69	3	1
ALL ALTERNATIVES Wildfire suppression 10 acres	3	2	28	1	0.4
ALL ALTERNATIVES Wildfire suppression 110 acres	286	199	2,768	125	44
ALL ALTERNATIVES Wildfire suppression 10,000 acres	2,856	1,999	27,681	1,252	441

5) See response #3. Strategic fuels treatments may utilize either prescribed fire OR mechanical fuel modification. We concur that Alternative 4 minimizes air quality impacts, however see response #2.

6) Alternative 2 already incorporates mechanical fuel modification as a technique for strategic fuels reduction. Ecological prescribed burning is meant for those circumstances when alternative methods such as mechanical means do not allow ecological objectives to be met or is environmentally inferior when all environmental factors in addition to air quality are considered. Also, see response #3.

7) Mitigation measures to reduce smoke emissions will be considered for any prescribed burn project as part of the park's NEPA/NHPA environmental review that is required for any project in the park.

8) Alternative 6 considered creating a landscape mosaic of different fuel loads using mechanical methods rather than prescribed burning. It was analogous to Alternative 1 (no action) that proposed treating 4500 acres throughout the park with prescribed fire over a five-year period. This alternative was rejected from further analysis because it is inconsistent with NPS policy to protect the significant scenic, recreational and natural resources that the SMMNRA was established to protect. Problems with the alternative include: 1) degradation of plant and animal habitats, 2) ineffectiveness to prevent large scale fires (see analysis of Alternative 1, Chapter 4). See the analysis of impacts of Alternative 4 (Chapter 4) which analyzed the impacts of mechanical fuel modification on <100 acres in the urban interface zone, within previously degraded habitat areas and compare that with the anticipated impacts of treating 4500 acres/5 years in pristine habitat areas.

9) See response #4. For conformity see Air Quality section, p. 3-112.

10) Chapter 4, Section IV, A1f (Rare, Threatened and Endangered Species-Animals) and Chapter 4, Section IV, A3 (Water Resources and Wetlands) identifies potential impacts to steelhead and steelhead habitat associated with specific treatments under each alternative. The environmentally preferred alternative (Alternative #2) avoids adverse impacts which may occur in Alternative 1 (no action). The only action for which specific impacts to steelhead populations can not be identified is strategic fuels modification. Because physical geographic locations remain to be identified, it is not possible to determine if there is any potential to affect steelhead or steelhead habitat. Therefore all strategic fuel reduction projects will be subjected to environmental analysis where all potential adverse impacts will be evaluated, including those to steelhead trout. The decision model for all strategic fuels projects (Figure 3-23), rejects projects that could adversely affect sensitive species such as steelhead trout. The mitigation matrix listed in Table 2-6 (Chapter 2, Section VI) additionally states our intent to avoid direct operational and fuel modification impacts to water resources and wetlands during wildfires.

11) We have noted that Section 7 consultation is required for adoption of plan in Chapter 1.VII.

12) There are no plans for prescribed burns in endangered wildlife habitat as there is no evidence that fire is required to enhance any rare and endangered wildlife species at this time.

13) Weed abatement is annual mowing or disking of herbaceous vegetation dominated by non-native annual grasses and forbs. Brush clearance is fuel reduction in vegetation dominated by native shrubs. These definitions have been incorporated into the definition of Mechanical Fuel Reduction in Chapter 2, Section II - Terminology.

14) We concur that a Resource Advisor be present at the Incident Command Post and in the field.

15) Landscape level fuel modification means reducing biomass in locations that may be remote from identified values at risk, but are strategic locations that would limit fire spread, protect identified values at risk, or allow control of a fire perimeter. Site specific hazard mitigation is the use of strategies that can be employed on the site of identified values at risk to reduce wildfire hazard, e.g structural resistance, brush clearance. This information has been added to the text describing the strategic fuel modification decision model (p. 3-37).

16) The plan is not trying to identify a specific landscape era. The general resource objectives are to increase or maintain native plant biodiversity, increase native plant cover and minimize cover and adverse impacts of non-native species.

17) Giant coreopsis (Coreopsis gigantea) has no state or federal status as a sensitive species.

18) We have added the Sycamore House at Point Mugu State Park to the list of structures potentially eligible for the National Register.

19) We recognize that Boney Mountain is a State Wilderness Area.

20) Incident Command Center is changed to Incident Command Post in the Mitigation Matrix (Table 2-6).

21) The authority to close park units is delegated to the Superintendent pursuant to Title 36 Code of Federal Regulations Part 1, Section 1.5(a) Closures and Public Use Limits and Section 1.7(a) Public Notices.

22) We have added the 1996 prescribed burn conducted adjacent to Las Virgenes Road by California State Parks as an example of a fire that is believed to have had a significant influence in the direction of the Calabasas Wildfire Incident in 1996. Post-simulator studies were conducted by Ishmael Messer, former fire management officer for the SMMNRA displayed

that the prescribed burn assisted firefighting efforts which kept the fire from advancing toward the Malibu Lake community.

23) We agree that defensible space is the most effective means to protect life and property in the event of wildfire. The DEIS emphasizes the importance of defensible space through fuel modification; it also emphasizes the responsibility of homeowners to provide and maintain this space. We agree that defensible space contributed to preventing significant losses during the 1996 Calabasas and 2003 Simi/Verdale Fires. Analysis of the 2003 San Diego County fires also identified defensible space as the best predictor of structure survival.

24) The DEIS applies only to projects on NPS property or projects funded with federal dollars administered by the NPS. The DEIS preferred alternative recommends the use of defensible space and landscape level fuel modification using either mechanical methods or prescribed fire. We added "biomechanical fuel modification" to include grazing as another method of mechanically reducing biomass.

25) The DEIS includes a comprehensive analysis of the fire climate and environment of the Santa Monica Mountains. The recommended alternative includes a full range of fire management actions and the criteria with which to prioritize and evaluate the effectiveness of fire hazard reduction projects. While NPS can only implement actions on its own properties, the analysis is valid for the entire Santa Monica Mountains. See responses #23 and #24.

26) See response #98. The decision tree applies only to landscape level strategic fuel modification projects. It does not apply to defensible space projects that are of demonstrated effectiveness. Any fuel modification project proposed for NPS property or using NPS funds requires environmental review in accordance with NEPA. The DEIS applies to actions taken on NPS lands and the NPS mandate under federal law requires that natural resource values be protected after the safety of people and property have been assured. Any project on NPS land will be evaluated for impacts to resources and mitigated to avoid or minimize impacts. The decision tree is an effort to provide a rigorous framework to identify whether a project will be effective in reducing wildfire hazard, threats to public and fire fighter safety, and meet project objectives and to identify environmental impacts against which potential benefits must be weighed.

27) The preferred alternative does not conflict with the Goals and Objectives section of the Los Angeles County Pre-fire Management Plan. The DEIS calls for the following management actions (Page 2-3 to 2-4):
    - Complete suppression of wildfires
    - Coordination of vegetation management with local fire agencies to improve the effectiveness of fire suppression activities involving NPS lands
    - Consultation with local fire agencies to protect resources during suppression activities
    - Assessment of wildland fire hazards to people, homes and resources; use public support and education to reduce the associated risks.

- Alternative 2 (preferred alternative): Prescribed burning is used to provide resource enhancement. In addition, hazard fuel reduction projects using prescribed fire or mechanical or bio mechanical fuel reduction are considered in strategic locations that reduce the chance of wildfires which may damage life and property, risk public and fire fighter safety or impact natural and cultural resources. Short-term and site-specific resource impacts of strategic prescribed fires are weighed against long-term and regional hazard fuel reduction benefits. Strategic zones are identified using up-to-date analyses of vegetation types, fuel characteristics, fire spread models, and potential hazards to life, property, and natural and cultural resources. Mechanical fuel reduction is concentrated at the urban interface to protect homes.

28) All alternatives, including the preferred alternative incorporate the 9 principles and 17 policies of the 2001 Federal Wildland Fire Management Policy of which firefighter and public safety are the first priority. (Page 1-5, Objective 1).

29) We continue to look forward to more opportunities to collaborate. In response to this letter SMMNRA staff met with Los Angeles County Fire Department representatives to discuss the issues raised in this letter and requested follow-up correspondence to document these discussions.

30) It is acknowledged that a smoke management plan and a burn permit are required from the Ventura County Fire Department. The requirements are found at www.vacpcd.org.

31) We will incorporate the recommended air quality mitigation measures that offroad diesel-powered equipment not be left idling for more than 5 minutes and that it be maintained in good condition and in proper tune (Table 2-6).

32) Alternative 2, the environmentally preferred alternative, seeks to identify the most effective strategies to protect life and property, while providing explicit criteria to ensure protection of natural resources when considering any fuel modification project located away from the wildland urban interface (Figure 3-23). Alternative 2 is environmentally superior to Alternative 1, the no action alternative. The mitigation matrix (Table 2-6) identifies numerous measures that are designed to reduce the impacts of current practices related to vegetation management.

33) The term “fuel” is used when referring to technical terms related to the flammable characteristics of vegetation e.g. fuel load, live fuel moisture, mechanical fuel modification, live fuels, fuel type. The term “fuel” or “brush” is not substituted when we mean chaparral or coastal sage scrub or vegetation. The vegetation of greatest concern with respect to fire hazard are those vegetation types with the highest fuel load e.g. chaparral, coastal sage scrub, or ornamental trees such as pines and eucalyptus. Fine fuels such as non-native grasses and herbaceous weeds are of concern for their ease of ignition and their ability to rapidly spread fire.

34) The SMMNRA supports removing non-native plants and is working to prevent type conversion of native habitats. The mitigation matrix (Table 2-6, Vegetation) describes mitigation measures to address “fuel modification - loss of native vegetation” and “unnecessary vegetation removal and conversion that degrades habitat without increasing fire safety; fire ignitions” on both NPS lands and on private property inspected by local fire departments. The

SMMNRA encourages enough brush clearance by homeowners and agencies to increase safety for the public and firefighters, but discourages overzealous removal of vegetation that provides no protection benefit and damages the ecosystem.

35) The NPS recognizes the stabilizing role of chaparral shrubs on steep slopes (see Section IVA1 Vegetation and Section IV B Geology and Soils) and does not support removal of deep rooted shrubs on steep, erodible slopes. The SMMNRA encourages enough brush clearance by homeowners and agencies to increase safety for the public and firefighters, but discourages overzealous removal of vegetation that provides no protection benefit and damages the ecosystem.

36) Figure 3-22 is an effort to point out that when a fuel treatment is effective because wildfire occurs shortly after the treatment while fuel loads were still low, then it is more likely to have an adverse ecological impact because it is more difficult for native vegetation to recover from a short fire return interval. The figure is meant to illustrate the need for caution in evaluating fuel reduction projects and to consider how frequently treatments will need to be repeated to be effective and what the impact on native species will be under an effective treatment return interval. Ceanothus megacarpus was used as an example because it is the species for which we have the best data on the effects of short, repeated fire return intervals. The figure does not address biodiversity associated with age although we do point out (Section 3, Fire History) that old chaparral (>79 years) in the Santa Monica Mountains is very rare and should be protected.

37) The analysis of alternatives with respect to soils, erosion, and wetlands is in Sections 4A2 and 4A3. The SMMNRA encourages enough brush clearance by homeowners and agencies to increase safety for the public and firefighters, but discourages overzealous removal of vegetation that provides no protection benefit and damages the ecosystem.

38) We do not know if there are any strategic fuel modification locations that could help control fire spread during Santa Ana conditions which is why we outlined a process for analyzing whether such locations exist. If potential locations are identified we would use fire behavior modeling to assess the effectiveness of a fuel reduction project to control fire spread at that location. Ignitions are a separate issue from controlling a fire once it has started and spread. Roads in the Santa Monica Mountains are maintained annually to clear flashy fuels from roadsides. The majority of ignitions during Santa Ana wind conditions (and therefore for large fires) are from arson or arcing power lines. Any strategic fuels reduction project would need to comply with NEPA review. If the project were found to have significant environmental impacts it would be rejected and site specific mitigation would be recommended to protect the values at risk identified for the project (Figure 3-23). If the project were determined to be appropriate all impacts would need to be mitigated through the NEPA process.

39) Wildfire suppression is common to all alternatives and will occur with any wildfire in the Santa Monica Mountains. The operational impacts of fire suppression have been identified to be significant. The fire management plan has identified mitigation measures to reduce operational impacts to sensitive resources.

40) No new fuel modification on NPS properties is anticipated due to new development because Los Angeles and Ventura Counties require new homes to be set back adequately from parkland so that homeowners can perform all required brush clearance on their own properties.

41) The DEIS can not change land use policies of the jurisdictions within the national recreation area. The DEIS does provide analysis that might be used by local jurisdictions to affect land use policy related to wildfire safety and habitat conservation.

42) The SMMNRA can work on prevention strategies only in partnership with local fire departments, communities, and jurisdictions.

43) At this time, only non-native annual grasslands or areas of non-native weed species are proposed for ecological prescribed burns. The SMMNRA is currently studying the fire return interval appropriate for grassland burns, methods to control non-natives in years following burns, and restoration methods for native species re-introductions. The utility of fire for non-native species control is species-specific and does depend on factors such as how long-lived the seed bank is.

44) The mitigation matrix lists measures to avoid vegetation impacts in fuel modification zones. The DEIS applies only to actions taken by the SMMNRA on NPS lands. The SMMNRA encourages enough brush clearance by homeowners and agencies to increase safety for the public and firefighters, but discourages overzealous removal of vegetation that provides no protection benefit and damages the ecosystem.

45) We acknowledge that CNPS does not support any of the four alternatives. The measures that CNPS has recommended in order to support Alternative 4 (mechanical fuel reduction) have already been incorporated into the DEIS (see Mitigation Matrix – Vegetation, Table 2-6). The other recommendation by CNPS that the SMMNRA "create mountain development fire ordinances and regulations with the various bodies governing land use in the Santa Monica Mountains to place restrictions on construction and landscaping" is not within the scope of authority of the NPS. The SMMNRA can provide data and analysis to local jurisdictions that may assist in their development of fire-safety related ordinances, but cannot itself develop ordinances for local jurisdictions. The SMMNRA has incorporated numerous measures to provide information and education to communities to mitigate fire hazard and minimize environmental impacts (Table 2-6).

46) The SMMNRA states that public and firefighter safety are the first priority of the NPS; it also acknowledges that protection of natural resources is an additional mandate.

47) We acknowledge the support of Alternative 2, the preferred alternative.

48) The DEIS supports in detail the concept that major structural losses are associated with large, Santa Ana wind-driven fires. Most of the fire planning strategy assumes that Santa Ana winds are present as part of the worst-case scenario.

49) Figure 3-21 shows areas north and east of Topanga and Pacific Palisades that might be appropriate for strategic fuel modification. Figure 3-20 shows that almost none of these sites are on NPS land.

50) None of the four alternatives supports destruction of natural resources. The fire environment analysis did show that the no action alternative (Alternative 1) had the greatest potential to have long term adverse impacts to native plant communities. Alternative 2 was selected as the best alternative to protect and enhance natural resources and to provide the most effective mitigation of wildfire hazards, consistent with natural resource protection (Figure 3-23).

51) The selection of Alternative 2 was supported by analysis of individual impact topics (Chapter 4) and summarized in Table 5-1.

52) See responses #46, #50, and #51.

53) See response #50. Mitigation measures are appropriate to impacts (Table 2-6).

54) The DEIS has specifically identified the threat of type conversion and all projects will be analyzed with this potential impact as a primary consideration.

55) See Response 53.

56) No new roads would be built under any of the alternatives.

57) Any fuel modification project would require an evaluation of the relative impacts and benefits of mechanical fuel reduction methods versus prescribed burn treatment methods. If mechanical methods were determined to have greater impacts an alternative method would be selected.

58) See response #50. The SMMNRA is working to develop co-operative research proposals to do more intensive surveys of invertebrate populations in the Santa Monica Mountains.

59) There is no reason to believe that any of the actions proposed in any of the alternatives could have an effect on a general "pollinator crisis" because of the small scale of the proposed actions relative to the scale of large wildfires. Native pollinators, like other plant and animal species have evolved with periodic large wildfires and must be resilient to fire's effects to have persisted in this ecosystem.

60) See response #50. There is no evidence that any action proposed under the preferred alternative could eliminate a native insect species.

61) The cost of habitat restoration for the El Segundo Blue butterfly at LAX (rather than the "re-establishment" of the population) was approximately $750,000 over three to five years for 200 acres. None of the DEIS alternatives requires habitat restoration for an endangered butterfly species, so ability to pay for this type of habitat restoration is not relevant.

62) See responses #58 and #59.

63) Lack of adequate information was identified in Table 2-6 for the effects of large wildfires on rare, threatened and endangered species. It is a priority of SMMNRA staff to document fire effects on sensitive populations after major wildfires. Support for this work would come as part of the work of permanent staff and from grants that would be submitted as needed.

There would be adequate information for any project (compared to unpredictable wildfires) because it would have to be reviewed under NEPA for impacts to sensitive species. Impacts to sensitive species would be grounds for rejecting a project (Figure 3-23).

64) Implementing alternative 2 in no way impairs the park's ability to study the interactions of wildfire and habitat fragmentation. Lack of adequate information was identified for the interactive effects of habitat fragmentation and large, unpredictable wildfires. The potential for a project to contribute to habitat fragmentation must be evaluated (Figure 3-23) and is grounds for rejecting a project if adverse impacts are identified. See Response 50.

65) See response #64.

66) See response #50.

67) Land use regulation is the authority of local jurisdictions and therefore outside the scope of the NPS. Co-operative efforts with local jurisdictions to reduce land use impacts/ wildfire hazard that do fall within the NPS mandate are identified in Table 2-6 under "Land Use" and "Reduce Risk of Catastrophic Wildfire".

68) See response #67.

69) Fuel modification standards and annual homeowner inspections are the responsibility of local fire departments. Each of these agencies has fuel modification guidelines that identify which species should be retained or removed. Table 2-6 recommends as mitigation of "unnecessary vegetation removal and conversion that degrades habitat without increasing fire safety" that NPS work with agencies to better educate residents about appropriate fuel medication techniques.

70) The NPS has an active program to remove invasive plant species from NPS property. See also Response 69.

71) The NPS regularly co-operates with organizations devoted to resource protection.

72) NPS acknowledges that the author does not support Alternative 2.

73) The SMMNRA states that public and firefighter safety are the first priority of the NPS; it also acknowledges that protection of natural resources is an additional mandate.

74) Comments are not in reference to the DEIS.

75) The DEIS analysis strongly supports the homeowner fuel modification zone as the most effective means to prevent structure loss and provide for homeowner and firefighter safety. Table 2-6 also recommends mitigation measure to minimize the adverse impacts created by fuel modification zones. The strategic fuel modification zones recommended in Alternative 2 serve a different purpose, i.e. to limit fire spread with the ultimate goal of keeping the final wildfire size smaller or away from identified resources at risk.

76) As stated in the DEIS, the goals of the SMMNRA Fire Management Program include protecting the park's natural and cultural resources. The current policy of using prescribed fire

on a landscape basis puts these resources at a greater risk by increasing an already undesirable fire return interval. The proposed approach of treating small, strategic locations with prescribed fire and mechanical fuel reduction to reduce the impacts of wildland fire, when coupled with the principals of defensible space, will protect firefighters and the public. Critical project review that evaluates effectiveness and potential environmental impacts will ensure that resources are protected (Figure 3-23).

77) Comments are not in reference to the DEIS. The National Park Service sent a copy of Mr. Rindge's 8/2/04 letter to the Los Angeles County Fire Department.

78) See response #67.

79) It is acknowledged that no alternative with prescribed burning is supported by the author due to concerns for smoke impacts on human health. All human health impacts from any prescribed burn project will be minimized in consultation with the local air pollution control district and will be described in the burn plan.

80) The NPS must consider measures to reduce risk to lives and homes in its Fire Management Program.

81) An important goal of the DEIS, once firefighter and public safety have been secured, is to protect the park's natural and cultural resources. Alternative 2 was selected as the best alternative to protect and enhance natural resources and to provide the most effective mitigation of wildfire hazards, consistent with natural resource protection (Figure 3-23).

82) The four alternatives considered included the full range of options that would realistically meet the NPS mandates for resource protection and wildfire safety.

83) The preferred alternative includes the greatest number of potential actions to provide for protection of residents, firefighters, structure survival, and limits to wildfire spread. The DEIS presents detailed evidence on the characteristics of the fire environment and the best available hazard mitigation strategies. The DEIS analysis shows that the other three alternatives are more limited and/or less effective in meeting the safety objectives of the Fire Management Program than the preferred alternative.

84) The DEIS analyzed the potential environmental impacts associated with each alternative as required by NEPA. Identifying the impacts associated with different types of fire management actions on chaparral or other native vegetation does not mean that a higher value has been placed on protecting flora than on the safety of homes and residents. Alternative 2 was selected as the best alternative to provide the most effective mitigation of wildfire hazards, consistent with the resource protection mission of the NPS.

85) The environmental analysis of the four alternatives was based on the best and most recent fire data and fire research available for the Santa Monica Mountains and is fully documented by data presented in the text and by supporting literature referenced in Chapter 7. The author does not cite any specific data or publications that would allow us to respond to his assertions that the DEIS analysis is biased or incorrect.

86) At this time we do not know the scale of impacts to vegetation (i.e. amount of acreage

affected) from wildfire or fire management practices such as short fire return intervals, cumulative type conversion from fuel modification around homes, or the spread of populations of invasive exotics from fuel breaks. There is no evidence that native plant communities impacted by fire management activities can be "easily mitigated by restoration in the field;" rather there is substantial published evidence that shrubland restoration is difficult, time consuming, and expensive.

87) See response #85.

88) Alternative 2 provides for fire management that is focused at the wildland urban interface, concentrating on fuel modification and defensible space which has been documented to be the most effective strategy to provide for structure protection and resident and firefighter safety. The DEIS analysis shows that Alternative 2 improves fire safety relative to the no action alternative which has been shown to be both ineffective and infeasible to implement. The DEIS has explicitly identified programs (Table 2-6) and analytical methods to identify projects (p.3-28) to improve fire safety that can be cooperatively carried out with local fire agencies.

89) The DEIS recognizes the importance of social values in accordance with NEPA and the NPS's fire management policy. There is extensive analysis in the DEIS regarding how to effectively minimize wildland fire losses (p. 3-27 to 3-40).

90) The DEIS includes all elements of the National Fire Plan and Federal Fire Policy cited by the author in Table 1-1, Objectives II and III. The policy objectives cited as excluded by the author are met with the following strategies identified in the DEIS: 1) Interagency coordination and cooperation to include federal land management agency and agencies with supporting or related programs as full partners in wildland fire management activities and programs, 2) Communication and education support to enhance understanding of the fire management mission for both internal and external audiences, and 3) use vegetation maps, fire history maps and other tools to develop risk assessments, which will identify and prioritize appropriate treatments. Nonetheless, the language suggested by the author will be included in Table 1-1, Objective III.

91) The Fire Management Plan goals on page 1-4 are explicit and are supported by the DEIS analysis. Alternative 2 was selected as the best alternative to meet all five goals.

92) The DEIS does not identify WUI funding to pay for restoration projects.

93) The DEIS fully supports and anticipates co-operative efforts between the fire agencies and NPS to reduce wildfire hazards in local communities. The DEIS provides detailed analysis of the risk to local communities from wildfire (Chapter 3, Section III/Fire Environment).

94) The strategic fuels analysis is an example of how locations for strategic fuels projects might be identified. It is a method to determine project priorities because only a small % of the land at risk from wildfire can be treated. The constraints of slope were identified as reasonable operational criteria by David Kerr, former SMMNRA fire management officer. The vegetation criteria were selected to provide the greatest and longest lasting benefit from fuels treatment. Social criteria are incorporated in Figure 3-21 with increased housing density representing higher priority areas. The model can be varied to incorporate any criteria

that might be used to identify locations that would act as effective strategic fuel modification locations for significant social resources.

95) The decision model for strategic fuel modification projects (Figure 3-23) misused the term "Environmental Assessment" which was meant in the sense of "environmental review" not in terms of a specific NEPA document. Although there is a categorical exclusion for hazard fuels projects less than 4500 acres, all federally funded projects or projects on federal property must comply with the park's NEPA requirements. The appropriate language, which will be substituted for "EA" in the text and in Figure 3-23, will be "NEPA and NHPA review and documentation."

96) The amount of acreage for the park's defensible space was provided by the park's fire staff with the assumption that the park was already providing all necessary fuel modification on park property to homes that predated the land being acquired for parkland. No increase in fuel modification acreage on parkland from new development was anticipated because new development is required to be sufficiently setback from the park boundary to allow all necessary fuel modification to be done on the private property. The park is beginning a parcel by parcel assessment for a GIS database to determine if any additional fuel modification on park property is required to protect existing homes. When this analysis is completed, any increased acreage required to be treated with mechanical fuel modification on park property will be incorporated into the Fire Management Plan's annual update with appropriate NEPA compliance.

97) See response #15. Site specific fuel modification (mechanical treatment) is specifically identified as alternatives to remote strategic fuels treatments to meet safety objectives.

98) It is impossible to create an age mosaic in a landscape dominated by large, wind-driven fires. For example, 37% of the SMMNRA is 11 years old from the two 1993 fires that together burned 55,000 acres. See Figure 3-15 (Fire History: Time Since Fire) to see how the landscape is dominated by large areas of a single age class representing the footprint of the last large fire.

99) The DEIS repeatedly identifies the advantages of fuel modification to create defensible space at the WUI.

100) The DEIS addresses both the benefits and the impacts of creating defensible space around homes and creating strategic fuel modification areas. The preferred alternative allows the maximum range of fire management options including mechanical fuel reduction and strategic fuels treatments despite their potential impacts. The preferred alternative does require that projects be critically evaluated to determine if they will be effective. This is not an obstacle but a necessary part of responsible fire management planning. For projects on SMMNRA property or supported by NPS funds, environmental review for NEPA compliance is not only necessary but required.

101) Firefighter safety is most compromised during large scale, wind-driven fires where hundreds of firefighters from outside the local area are called in to protect poorly sited homes on narrow or remote roads in steep canyons or ridges surrounded by flammable vegetation types. The responsibility for firefighter safety under these circumstances rests with the incident commanders. The preferred alternative supports projects that will mitigate haz-

ards to structures and to firefighters defending them, as well as projects that might have the potential to limit wildfire spread.

102) The SMMNRA states that public and firefighter safety are the first priority of the NPS; it also acknowledges that protection of natural resources is an additional mandate.

103) None of the four alternatives support destruction of natural resources. The scale of the proposed actions makes it impossible to convert the native environment (~112,000 acres of habitat) to an exotic landscape from actions proposed in the preferred alternative, e.g. mechanical fuel modification of 90 acres/year of the same 90 acres each year and a maximum of 750 acres/5 years of strategic fuel modification with NEPA/NHPA review.

104) See response #103. The DEIS analyzed the potential environmental impacts associated with each alternative as required by NEPA. Alternative 2 was selected as the best alternative to provide mitigation of wildfire hazards and resource protection, consistent with the DO-18 goal to "use the least intrusive and resource damaging methods to manage wildland fire" and to "protect park resources and natural ecosystem processes". The analysis of alternatives was developed by the same "expert botanists, ecologists, and wildfire specialists" that provided the supporting data compiled in the DEIS.

105) See response #104.

106) The applicability of the CNPS Botanical Survey Guidelines to the DEIS alternatives is unclear.

107) The applicability of the conservation ethics described in an article on documentation with voucher specimens for EISs and EAs to the DEIS is unclear.

108) See pages 1-13 of the DEIS for its relationship to GMP goals.

109) No specific locations have been identified for strategic fuel modification projects. Botanical surveys would be carried out when a project was proposed as part of the NEPA/NHPA compliance process.

110) See Response 94 and Figure 3-23. Plant and animal impacts of strategic fuel modification projects would be evaluated when a project was proposed as part of the NEPA/NHPA compliance process. Environmental risk/benefit analysis of strategic fuel modification projects would be evaluated when a project was proposed as part of the NEPA/NHPA compliance process.

111) No restoration/rehabilitation is anticipated with any proposed project action.

112) Type conversion is a threat primarily to shrublands such as chaparral and coastal sage scrub. Ecological prescribed burning is proposed only in annual grasslands for restoration to woodlands, native grasslands or shrublands. The potential for type conversion from prescribed burning for strategic fuel modification projects would be evaluated when a project was proposed as part of the NEPA/NHPA compliance process. See also response #103.

113) The potential for mechanical impacts versus those from prescribed burning for strategic

fuel modification projects would be evaluated when a project was proposed as part of the NEPA/NHPA compliance process. See also response #103.

114) The potential for ecosystem impacts from strategic fuel modification projects would be evaluated when a project was proposed as part of the NEPA/NHPA compliance process. See also response #103.

115) Protection of core resources by limiting habitat fragmentation is a specific criterion required to be evaluated for strategic fuel modification projects (Table 3-23).

116) The guiding policy of the NPS is to "conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." (National Park Service Organic Act of 1916)

117) See response #116.

118) See response #115. Guidelines to minimize operational impacts during wildfire suppression are described in the DEIS.

119) See response #113.

120) See response #111.

121) See responses #103 and #104. The preferred alternative was selected by a comprehensive analysis of all expected impacts and all expected benefits. Taking individual statements out of context is inconsistent with the environmental analysis process.

122) The environmental analysis was performed in accordance with DO-12, the NPS NEPA handbook.

123) The purpose of the strategic fuel modification zones recommended in Alternative 2 is to limit fire spread with the ultimate goal of keeping the final wildfire size smaller or away from identified resources at risk. It is predicated on the existence of landscape features that would make control feasible. Prior to implementing a project, the effectiveness must be demonstrated with fire behavior modeling.

124) The impacts of burn season for strategic fuel modification projects would be evaluated when a project was proposed as part of the NEPA/NHPA compliance process.

125) See response #113.

126) See response #116 and mitigation measures to vegetation (Table 2-6, pages2-19 - 2-20).

127) See response #103. The impacts of any specific strategic fuel modification project would be evaluated when a project was proposed as part of the NEPA/NHPA compliance process.

128) See responses #116 and #103.

129) The DEIS applies only to actions taken by NPS on SMMNRA property. Stipulating brush

clearance regulations elsewhere is not within the scope of authority of the NPS. The SMMNRA can provide data and analysis to local jurisdictions that may assist in their development of fire-safety related ordinances, but cannot itself develop ordinances for local jurisdictions. The SMMNRA has incorporated numerous measures to provide information and education to communities to mitigate fire hazard and minimize environmental impacts (Table 2-6).

130) The plan does not try to identify specific target conditions. The general resource objectives are to increase or maintain native biodiversity, increase native species cover/density and minimize the cover/density and adverse impacts of non-native species.

131) Herbicide and pesticide use is not part of any of the proposed actions in Alternative 2. If it were necessary to use any herbicide in conjunction with a fuels project, its use would be evaluated when a project was proposed as part of the NEPA/NHPA compliance process.

132) No restoration is anticipated with any proposed project action. Monitoring is required and will be accomplished with all projects.

133) No direct impact to the seedbank is anticipated with any proposed project action.

134) The scale of the actions proposed in the preferred alternative is not anticipated to cause erosion, soil loss or mass movement. Potential soil impacts would be evaluated when a project was proposed as part of the NEPA/NHPA compliance process.

135) General mitigation measures have been proposed to control invasive species introductions (Table 2-6). Project conditions to control invasive species introductions will be required as part of the NEPA/NHPA compliance process for specific projects.

136) A portion of the 90 acres of the SMMNRA maintained fuel modification zones are currently disked.

137) No roads and trails will be made. No fuel modification areas will be made available to off-road vehicles.

138) No actions identified in the preferred alternative would facilitate drilling for gas or oil; would promote introducing exotic plants for harvest; or would facilitate development.

139) Eucalyptus and pine trees are removed from park property when it has been determined to be appropriate and as funding is available. The park maintains a list of exotic plant species which it maps and works to control.

140) A program designed for the long term management of wildland fire cannot be compared to emergency suppression aircraft.

141) SMMNRA will evaluate and monitor all potential impacts to cultural resources in accordance with the mitigation measures described in Table 2-6.

142) The NPS agrees that intermix and interface areas increase daily with development into wildland areas and that the problem needs to be addressed. Development is approved by local cities and counties and is outside the scope of authority of the SMMNRA EIS for the

Fire Management Plan. We acknowledge the need for planning departments to incorporate risk from wildland fire as part of the approval process and we would like to encourage and participate in that outcome.

143) The FMP EIS emphasizes the severe nature of the wildfire danger to residents of the Santa Monica Mountains (p3-27 to 3-40). Because of the nature of the vegetation and the climate (Chapter 3.III) there is no action that the NPS can take to prevent a large wildfire under Santa Ana wind conditions. We agree that active mitigation measures need to address the intermix and interface. The first line of defense against such a wildfire is for all residents to ensure that their own properties have an adequate fuel modification zone and that their buildings are as structurally resistant to ignition as possible. Alternative 2 allows for fuel modification through mechanical and biological means as well as strategic fuels reduction to address these high hazard areas.

144) The FMP EIS has identified both the impacts and benefits of all appropriate fire management actions based on the best information available (Chapter 4). Alternative 2 was selected because it provided the widest range of potential fire management actions. By law, the NPS must consider the potential impacts to park resources from any management action. Strategic fuels reduction requires environmental assessment. Fuels reduction that offers strategic fire control success is supported by the DEIS. Table 3-23 illuminates the environmental review process.. Map 3-19 shows locations with potential for successful strategic fuels reduction. The scope of the DEIS pertains to sites adjacent to NPS property and does not include all the intermix interface within the SMMNRA boundary.

145) The NPS is developing a GIS database to identify where development is located adjacent to park boundaries. The annual update of the FMP will address where additional mechanical fuel modification might be necessary along the park boundaries.

146) Ecological prescribed fire is not proposed for the purpose of providing hazard fuel reduction, but for the purpose of improving the quality of natural resources. The use of strategic fuel modification is the NPS's explicit effort to identify areas where fire spread might be controlled by selective fuel reduction.

147) The NPS concurs that Alternative 2 will best meet the fire management needs of both the Park Service and the Los Angeles City Fire Department.

Input 25

SANTA YNEZ BAND
OF MISSION INDIANS
Tribal Elders Council
P.O. Box 365
Santa Ynez, Ca 93460
(805)688-8446 FAX (805)693-1768
telders@santaynezchumash.org

December 22, 2004

Woody Smeck, Superintendent
National Park Service
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
Thousand Oaks, CA 91360-4207

RE: Draft Environmental Impact Statement
Fire Management Plan
Santa Monica Mountains National Recreation Area

Dear Mr. Smeck:

Thank you for contacting the Tribal Elders Council with the Santa Ynez Band of Mission Indians in regards to the above mentioned project.

Preserving our culture is of the utmost importance to the Elders in addition to the Tribe as a whole. While we understand the need for and are in support of the Fire Management Plan, we are concerned for the protection of cultural and archaeological deposits within the Santa Monica Mountains.

If regulations that apply to this project do not require the presence of a Native American monitor, we ask that you consider having a monitor in place in the event cultural resources cannot be avoided. If you decide to honor our request, please contact our office or Chumash of the project area.

Sincerely yours,

Adelina Alva-Padilla, Chairwoman
Tribal Elders Governing Board

AAP: hg

RECEIVED
DEC 27 2004

Input 26

VENTURA COUNTY FIRE PROTECTION DISTRICT

BOB ROPER
County Fire Chief

165 Durley Avenue
Camarillo, CA 93010-8586
(805) 389-9710
FAX (805) 388-4364

RECEIVED
MAY 23 2005

May 12, 2005

Woody Smeck, Superintendent
United States Department of the Interior
National Park Service
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
Thousand Oaks, CA 91360

Dear Superintendent Smeck:

The Ventura County Fire Department appreciates the opportunity to comment on the Environmental Impact Statement for the Santa Monica Mountains National Recreation Area's Fire Management Plan (SMMNRA FMP). We recognize the importance of establishing a collaborative effort between federal and local agencies in the reduction of hazardous vegetation and identifying additional measures that can assist in mitigating the risks associated with wildland fires.

Of the four proposed alternatives, the Ventura County Fire Department supports Alternative 2, which incorporates mechanical fuel reduction, ecological prescribed fire and strategic fuels treatment. This alternative is supported with the qualifications discussed below.

The National Fire Plan (NFP) has made significant strides in addressing the problems related to decades of fire suppression and the resulting increase in decadent fuels in our forests. The premise of the NFP was that an unnatural build up of fuel exists in our forests today due to successful fire suppression efforts that date back to the early 1900's. These successes ultimately lead to a disruption in the natural fire cycle and a corresponding increase in risk for catastrophic fires in our forests. The NFP also recognizes the impact of suburban spread into the interface areas and the difficulty involved in mitigating the hazards associated with wildland encroachment by these assets at risk.

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Input 26 continued

Unfortunately, the NFP did not adequately address the issues we face in southern California with our chaparral fuel types. Our problem lies more with the fact that our interface and intermix areas increase daily with development into wildland areas. Regardless of fire return intervals, the problem persists and needs to be addressed.

The SMMNRA FMP points out that fire return intervals in our local chaparral fuel beds are much more frequent than the average natural return interval estimated to be in the range of 50 to 70 years. The SMMNRA FMP also discusses how this increased frequency can ultimately type convert the fuels to coastal sage and grass models and increase the likelihood that invasive, non-native plants might replace the native vegetation. We do not dispute any of these findings. The Plan and suggested alternatives combined together do not adequately address that the fuels, whether 10 years old or 50 years old, still represent a significant hazard to the communities in the interface and the individual homes in the intermix, and proactive, mitigative measures need to be taken to address the problem.

Community protection should have a higher priority in the Plan. It is apparent that a conflict does exist in that fire hazard reduction and resource protection are not mutually beneficial in the chaparral and coastal sage fuel models. This fact is recognized and discussed in the body of the SMMNRA FMP. The Plan does not appear to equitably balance the two priorities and instead over weights the negative ecological effects of fire versus the benefits to the communities at risk from prescribed fire and mechanical fuel reduction.

The value of additional mechanical treatment in the interface is overlooked. The mechanical fuel reduction that is identified in each alternative in the Plan is limited by the National Park Service to that amount that is currently required to be cleared by the Ventura County Fire Department's Fire Hazard Reduction or "Defensible Space" Program. Your plan identifies the value of treating fuels in the interface, yet none of the alternatives propose increasing mechanical treatment in the interface areas. These treatment areas are perhaps the most valuable in protecting structures in the interface.

The majority of the vegetation identified for treatment has little benefit in protecting the communities at risk. The ecological prescribed fires proposed in alternatives 2 and 3 have little relative value for structure protection in that they typically target grass fuel models that are very receptive to fire yet do not burn with the intensity of those fuels found in brush fuel models. Projects of this type typically have protective values for one fire season. Removing fine fuels from areas adjacent to roadways may serve to reduce fire starts. We would be pleased to work with park management in identifying areas that might benefit from projects of this type.

We value the opportunity to comment on the Environmental Impact Statement for your Fire Management Plan and look forward to working with your agency in making our communities more fire safe.

Sincerely,

BOB ROPER
Fire Chief

BR:ML:mt

Input 27

BOARD OF FIRE COMMISSIONERS

JAY H. GROSIN
PRESIDENT

ROLAND COLEMAN
VICE PRESIDENT

LOUISE L. FRANKEL
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VERONICA GUTIERREZ

BLANCA GOMEZ-REVELES
EXECUTIVE ASSISTANT II

CITY OF LOS ANGELES
CALIFORNIA

JAMES K. HAHN
MAYOR

DEPARTMENT OF FIRE

WILLIAM R. BAMATTRE
FIRE CHIEF

200 NORTH MAIN STREET
LOS ANGELES, CA 90012

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FAX: (213) 978-3815

http://www.lafd.org

May 19, 2005

Mr. Woody Smeck, Superintendent
United States Department of the Interior
National Park Service
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
Thousand Oaks, CA 91360-4207

Dear Superintendent Smeck:

COMMENTS REGARDING ENVIRONMENTAL IMPACT STATEMENT – FIRE MANAGEMENT PLAN

The Los Angeles Fire Department (LAFD) respectfully submits the following comments and/or input on the National Park Service's Environmental Impact Assessment for the Santa Monica Mountains National Recreation Area (SMMNRA) Fire Management Plan. As you are aware, both of our agencies share common values and interests, including the protection of life, property, and the environment.

Members from the LAFD's Brush Clearance Unit, Wildland Fuel Management Unit, Brush Committee, and Administrative Staff have met with representatives of the National Park Service regarding the range of alternatives being considered for the SMMNRA Fire Management Plan. Additionally, members from our Planning Section attended a public meeting held in the Santa Monica Mountains to listen to comments made by citizens and other agencies, and provided input concerning this important task. As discussed in these meetings, the SMMNRA is highly unique in natural wildlife, cultural history, and scenic resources and clearly the Fire Management Plan effects numerous public agencies, jurisdictions, non-profit organizations and communities.

Our organizations are both concerned that wildland fires can rapidly transform a beautiful and peaceful environment in the Santa Monica Mountains into a life-threatening major disaster area. Most wildland fires can be effectively suppressed when the weather conditions are moderate. However, wildland fires can be extremely challenging for fire suppression resources during high wind, low humidity, and dry fuel conditions. Despite sophisticated firefighting equipment and highly trained personnel, suppression efforts have limited success during extreme weather conditions without effective fuel mitigation and community education. The purpose of the SMMNRA Fire Management Plan is to evaluate the impacts of implementing various fire management alternatives in the Santa Monica Mountains.

Input 27 continued

Mr. Woody Smeck, Superintendent
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Page 2

The LAFD highly recommends and supports **Alternative 2** of the Santa Monica Mountains National Recreation Area - Fire Management Plan and respectfully concurs with the National Park Service that it should be selected and implemented.

The National Park Service's Fire Management Plan proposes five specific actions to minimize and control the impact from fire in the Santa Monica Mountains. The use of all or some of these actions is incorporated into the four proposed alternatives within the Fire Management Plan.

The description of the five *specific actions* include:

- **Wildfire Suppression** – Wildfire suppression is an action incorporated into all of the alternatives within the Fire Management Plan. The National Park Service and the LAFD support wildfire suppression for all fires in the Santa Monica Mountains because of its dense areas of urban interface. It is recognized by both agencies that the purpose of wildfire suppression is to limit the area burned in order to preserve life and property, while limiting habitat fragmentation caused by fire.

- **Mechanical Fuel Reduction** – Mechanical fuel reduction is an action that when implemented reduces hazardous fuel loads by a mechanical means, i.e., chainsaw, shears, etc. This form of fuel reduction is concentrated at the wildland urban interface to areas adjacent to (within 200 feet in Los Angeles) residential structures. The main purpose of this action is to provide structures with a defensible space and limit habitat fragmentation.

- **Ecological Prescribed Fire** - Ecological prescribed fires are only proposed in annual grasslands (i.e., not shrublands) so that the visual impact of the prescribed fire will have disappeared within six months. The specific intent of this type of prescribed burn is to target hazard fuel while promoting ecosystem restoration and habitat protection.

- **Strategic Fuel Reduction** – Strategic fuel reduction is an action that reduces brush or fuel load by either prescribed burn or mechanical fuel reduction. The specific intent of this action would be to reduce fuels in strategic locations to limit fire spread, protect identified values at risk, and/or allow control of a fire perimeter.

- **Education and Community Support** – An important action that is common to all the Fire Management Plan Alternatives is education and community support. An essential part of reducing the risk to homeowners and residents requires that they assume personal responsibility for their property and are aware of the potential danger fire poses to their community in the Santa Monica Mountains. The National Park Service and the LAFD are both committed to provide education and assistance for the community. This action is also incorporated into all the alternatives.

Alternatives

The following is a brief description of the four proposed SMMNRA Fire Management Plan Alternatives and the LAFD's associated concern and/or support statements (*in italics*):

Alternative 1 - No Action. Continue the current National Park Service's fire and vegetation management program to create a landscape mosaic of varying aged chaparral through the application of prescribed fire

AN EQUAL EMPLOYMENT OPPORTUNITY – AFFIRMATIVE ACTION EMPLOYER

Input 27 continued

Mr. Woody Smeck, Superintendent
May 25, 2005
Page 3

Statement: *This alternative is currently utilized by the National Park Service for fire and vegetation management in the Santa Monica Mountains. This alternative does not propose any mechanical fuel reduction with the purpose of providing a defensible space around structures similar to the LAFD's Brush Clearance Program. Additionally, this alternative proposes limited strategic fuel reduction that when utilized has historically minimized the spread of brush fires.*

Alternative 2 – Prescribed burning is used to enhance the environment by eliminating old growth to make room for new growth. In addition, hazardous fuel reduction projects using prescribed burn and mechanical fuel reduction would be utilized in strategic locations to reduce the chance of fire spread. Mechanical fuel reduction in this alternative is concentrated at the wildland urban interface to protect structures.

Statement: *This alternative uses prescribed burning that provides fuel modification benefits for grassland areas. In addition, it utilizes strategic fuel modification projects to modify fire spread. Most importantly, from the LAFD's perspective, this alternative provides a defensible space for structures through mechanical fuel reduction at the wildland urban interface.*

Alternative 3 -- Prescribed burning is used for enhancement only. Additionally, mechanical fuel reduction is incorporated into this alternative at the wildland urban interface to protect structures.

Statement: *This alternative proposes mechanical fuel reduction to provide a defensible space around structures within the wildland urban interface. This alternative does not incorporate strategic fuel reduction actions for the specific purpose of minimizing the spread of potential brush fires.*

Alternative 4 - Mechanical fuel reduction only and is concentrated at the wildland urban interface to protect structures.

Statement: - *This alternative provides effective protection for structures through mechanical fuel reduction at the wildland urban interface only. This alternative does not incorporate strategic fuel reduction or ecological prescribed as an action within the alternative.*

After analyzing the four alternatives it has been determined that Alternative 2 provides the greatest number of options for minimizing the impact of a brush fire in the Santa Monica Mountains. It allows all the proposed actions in the Santa Monica Mountains Fire Management Plan to be incorporated without favoring one strategy over another. This alternative also allows the National Park Service and the LAFD, both with different missions and purpose, to meet their needs with similar solutions. Reducing hazardous fuels in strategic locations has already proven to be one of the most effective methods of protecting life and property in Los Angeles. The National Park Service, through their endorsement of Alternative 2 has also concluded that hazardous fuel reduction strategies maintain and enhance the environment in the Santa Monica Mountains. Meetings with both our agencies and input from the community has determined that implementation of this alternative would ultimately enhance public safety, provide a higher level of protection for property, and increase the firefighters odds toward fire suppression while protecting the natural and cultural resources in the Santa Monica Mountains.

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

Input 27 continued

Mr. Woody Smeck, Superintendent
May 25, 2005
Page 4

Thank you for allowing the LAFD's comments to be considered regarding the National Park Services Environmental Impact Statement.

If you have any questions regarding our comments, please contact Battalion Chief Tim Kerbrat at (213) 485-6273.

Very truly yours,

FOR WILLIAM R. BAMATTRE
Fire Chief

AN EQUAL EMPLOYMENT OPPORTUNITY – AFFIRMATIVE ACTION EMPLOYER

Appendix G Concurrence From Regulatory Agencies

Concurrence 1

STATE OF CALIFORNIA—THE RESOURCES AGENCY ARNOLD SCHWARZENEGGER, GOVERNOR

CALIFORNIA COASTAL COMMISSION
45 FREMONT, SUITE 2000
SAN FRANCISCO, CA 94105-2219
VOICE AND TDD (415) 904-5200
FAX (415) 904-5400

June 27, 2005

RECEIVED JUN 29 2005

Woody Smeck
Superintendent, Santa Monica Mountains NRA
National Park Service
ATTN: Ray Sauvajot
410 West Hillcrest Drive
Thousand Oaks, CA 91360-4207

Subject: Negative Determination ND-069-05, Draft Fire Management Plan for Santa Monica Mountains National Recreation Area, Los Angeles and Ventura Counties

Dear Mr. Smeck:

The Coastal Commission staff has reviewed the above-referenced negative determination. The National Park Service (Service) has submitted a Draft Fire Management Plan for federal lands within the Santa Monica Mountains National Recreation Area (NRA) in Los Angeles and Ventura Counties. The preferred alternative in Draft Fire Management Plan proposes three general actions:

- Mechanical Fuel Modification: Continue to perform fuel modification and weed abatement on approximately 90 acres of parkland located at the wildland urban interface. These are areas that have been maintained as fuel modification zones for many years and are low quality habitat of predominately non-native annual grassland.

- Ecological Prescribed Fire: Consider the use of prescribed fire in annual grasslands to restore native species or control non-native invasive species.

- Strategic Fuel Reduction: Identify potential locations where reduction of plant biomass by either prescribed fire or mechanical fuel treatments in strategic locations would modify fire behavior to the extent that it would limit fire spread, protect identified values at risk, or allow control of a fire perimeter.

The Service notes in its negative determination that the absence of fixed geographical locations for potential fire management and fuel modification projects in the NRA precludes a complete analysis at this time of potential effects to coastal zone resources. As a result, the Service will undertake additional National Environmental Policy Act analysis for individual projects which will be developed during implementation of the Fire Management Plan. This will allow the Service to adequately assess project-specific effects on sensitive resources within the NRA and on the adjacent coastal zone, and to develop any necessary mitigation measures to protect those resources.

Concurrence 1 continued

ND-069-05 (National Park Service)
Page 2

The Service has also committed to submit additional consistency and/or negative determinations to the Commission for any future Fire Management Plan projects within the NRA that hold the potential to adversely affect coastal zone resources. With this commitment, the Commission staff **agrees** that the proposed Draft Fire Management Plan will not adversely affect coastal resources, and we therefore **concur** with your negative determination made pursuant to 15 CFR 930.35 of the NOAA implementing regulations. Please contact Larry Simon at (415) 904-5288 should you have any questions regarding this matter.

Sincerely,

(for) PETER M. DOUGLAS
Executive Director

cc: South Central Coast District office
California Department of Water Resources
Governor's Washington, D.C., Office

Concurrence 2

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southwest Region
501 West Ocean Boulevard, Suite 4200
Long Beach, California 90802-4213

151422SWR04PR13930:APS

JUN 7 2005

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JUN - 8 2005

Woody Smeck
National Park Service
Santa Monica Mountains Recreation Area
401 West Hillcrest Drive
Thousand Oaks, California 91360

Dear Mr. Smeck:

NOAA's National Marine Fisheries Service (NMFS) reviewed the National Park Service's (NPS) letter of May 13, 2005, regarding the fire management plan (FMP) for the Santa Monica Mountains National Recreation Area (action area). The preferred alternative of the FMP includes mechanical fuel modification, ecological prescribed fire, and strategic fuel reduction, which would be undertaken in the action area. Endangered steelhead trout (*Oncorhynchus mykiss*) are present in the action area and are susceptible to any upstream activity, including activities related to the proposed action. NMFS understands that NPS determined the proposed action (i.e., preferred alternative of the FMP) is not likely to adversely affect steelhead, and requested concurrence with this determination.

NMFS agrees with NPS' determination. The proposed action appears to contain sufficient measures to reduce the likelihood that fire-management activities would adversely affect steelhead. Further, activities under the preferred alternative would be confined only to areas where effects are not expected to extend into steelhead habitats.

This concludes section 7 consultation for this proposed action. Consultation must be reinitiated where discretionary federal agency involvement or control over the action has been retained (or is authorized by law) and: (1) if new information becomes available revealing effects of the action on listed species in a manner or to an extent not previously considered, (2) if project plans change, (3) if the agency action is subsequently modified in a manner that causes an effect to listed species that was not considered, or (4) if a new species or critical habitat is designated that may be affected by this action. Please call Anthony Spina at (562) 980-4045 if you have any questions concerning this letter or if you would like additional information.

Sincerely,

Rodney R. McInnis
Regional Administrator

Concurrence 3

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ventura Fish and Wildlife Office
2493 Portola Road, Suite B
Ventura, California 93003

IN REPLY REFER TO:
PAS 2151.3142.3721

July 27, 2005

Memorandum

To: Superintendent, Santa Monica Mountains National Recreation Area, Thousand Oaks, California

From: Division Chief, Southern Santa Barbara/Ventura/Los Angeles Counties, Ventura Fish and Wildlife Office, Ventura, California

Subject: Santa Monica Mountains National Recreation Area Fire Management Plan, Ventura and Los Angeles Counties, California

We have reviewed your revised request, dated May 13, 2005, and received in our office on May 17, 2005, for our concurrence with your determination that prescribed burning and fuel modification activities outlined in your fire management plan are not likely to adversely affect 22 federally threatened and endangered species. These species are:

Salt marsh bird's beak	*Cordylanthus maritimus ssp. maritimus*
Lyon's pentachaeta	*Pentachaeta lyonii*
Braunton's milk-vetch	*Astragalus brauntonii*
Coastal dunes milk-vetch	*Astragalus tener* var. *titi*
Marcescent dudleya	*Dudleya cymosa* ssp. *marcescens*
Santa Monica Mountains dudleya	*Dudleya cymosa* ssp. *ovatifolia*
Conejo dudleya	*Dudleya abramsii* ssp. *parva*
Verity's dudleya	*Dudleya verityi*
Wright's (=Quino) checkerspot butterfly	*Euphydryas editha quino*
Callipe silverspot butterfly	*Speyeria callippe callippe*
Riverside fairy shrimp	*Streptocephalus woottoni*
Tidewater goby	*Eucyclogobius newberryi*
Southern California steelhead trout	*Oncorhynchus mykiss*
California red-legged frog	*Rana aurora draytonii*
Brown pelican	*Pelecanus occidentalis californicus*
Light-footed clapper rail	*Rallus longirostris levipes*
California least tern	*Sterna antillarum browni*
Southwestern willow flycatcher	*Empidonax trailii extimus*
Least Bell's vireo	*Vireo bellii pusillus*
Bald eagle	*Haliaeetus leucocephalus*
Western snowy plover	*Charadrius alexandrinus nivosus*
Coastal California gnatcatcher	*Polioptila californica californica*

Concurrence 3 continued

Your proposed fire management plan for the Santa Monica Mountains National Recreation Area (Santa Monica Mountains NRA) provides a framework for three fire management strategies under your preferred alternative (National Park Service 2004): mechanical fuel modification, ecological prescribed fire, and strategic fuel reduction. Although discussed in your fire management plan, you have not requested informal consultation on fire suppression activities. These can be dealt with on an emergency consultation basis during individual suppression events, as needed. Details of fire suppression activities are not discussed further in this memorandum.

Mechanical fuel modification would involve the continued weed abatement and maintenance of a reduced fuel load on approximately 90 acres of parkland located at the wildland urban interface. These areas have been maintained as fuel modification zones for many years and are predominantly non-native annual grasslands of low habitat quality that retain little or no native vegetation. Only those areas that fall within 200 feet of structures would continue to be maintained as fuel modification zones. To maintain the effectiveness of the fuel modification zones, herbaceous vegetation needs to be reduced annually, while shrubs and trees need to be limbed or removed only every few years. Because Los Angeles and Ventura Counties do not permit new development that requires vegetation clearance on park property, there will be no need to expand the zone of mechanical fuel modification beyond those areas that are already maintained by the park.

Ecological prescribed fire would be conducted in annual grasslands or oak savannah that are depauperate of native plant species and are dominated by non-native grasses and forbs. Ecological prescribed fire would be used to restore native species or control non-native invasive plants. Projects would generally not exceed 275 acres at any one time, with up to 4 projects occurring per year. In all likelihood, the largest projects would be approximately 150 acres. No resident sensitive (including federally listed) species that could be directly affected by prescribed fire are expected to occur in these restoration areas. However, all sites would be surveyed for potential listed species prior to finalizing a prescribed burn project; if present, the burn plan would be modified as necessary to avoid adverse effects (National Park Service 2004).

Strategic fuel reduction would be conducted in strategic locations where fire behavior would be modified to the extent that it would limit fire spread, protect identified values at risk, or allow control of a fire perimeter. It would be accomplished through the use of prescribed fire or mechanical fuel treatments. You have proposed 150 acres per project with a maximum of 2 projects per year that could realistically and reliably be treated by park personnel in co-operation with partner agencies. The individual strategic fuel reduction zones have not yet been identified and mapped. Any strategic fuel reduction project would require a separate environmental assessment and risk/benefits analysis, as well as a request for concurrence, if appropriate. However, as stated in your letter requesting concurrence, any direct or indirect adverse impacts to sensitive or listed species would preclude a strategic fuels reduction project from being implemented

Concurrence 3 continued

We concur with your determination that your plans for mechanical fuel modification, ecological prescribed fire, and strategic fuel reduction described in the fire management plan for the Santa Monica Mountains NRA are not likely to adversely affect any of the species listed above under jurisdiction of the Service. The southern steelhead trout is administered by the National Marine Fisheries Service. Our concurrence for the other 21 species is based on the following.

Some of the species are not likely to be found within the Santa Monica Mountains NRA. The coastal dunes milk-vetch only occurs in Monterey County (Service 2004). The Callippe silverspot butterfly is found only in the San Francisco Bay area (San Mateo and Alameda Counties). Wright's checkerspot butterfly (= Quino checkerspot butterfly) is found in San Diego, Riverside, San Bernardino, and Orange Counties. The Riverside fairy shrimp has never been recorded in the Santa Monica Mountains NRA.

A number of the bird species for which you are requesting concurrence, and which occur in Ventura and Los Angeles Counties, basically fall into this same category. They are not likely to be found within the Santa Monica Mountains NRA, at least not breeding within the Santa Monica Mountains NRA. The California gnatcatcher has never been recorded from the Santa Monica Mountains NRA. The bald eagle (and California condor) are historic to the Santa Monica Mountains, but there have been no recent sightings. The least Bell's vireo and southwestern willow flycatcher occasionally pass through the Santa Monica Mountains during migration, but have never been documented to nest there. Additionally, fuel modification would also be steered away from riparian areas, with a 100-foot set-back provided from riparian vegetation (where least Bell's vireos and southwestern willow flycatchers would be found, if present). If adults of any of these bird species were to be found in or near areas being treated by National Park Service fire crews, they would simply fly away from fire management activities to nearby suitable habitat. Also, if these birds or any other listed species were to be detected in within a fire management zone, project activities would be modified such that adverse effects to the species would be avoided.

A number of the species for which you are requesting concurrence are restricted to coastal habitats. The salt marsh bird's-beak, brown pelican, light-footed clapper rail, California least tern, and western snowy plover are all found in coastal salt marsh and coastal strand habitats (*e.g.*, in and around Mugu Lagoon). In such habitats, fire management activities are unnecessary and would not be conducted.

A number of the species for which you are requesting concurrence are found within the Santa Monica Mountains NRA, but not on National Park Service property. Verity's dudleya and Conejo dudleya can be found within the Santa Monica Mountains NRA, but both have restricted distributions in the west end of the Santa Monica Mountains and Montclef Ridge, respectively, and are not likely to be found on existing National Park Service parkland where fuel reduction activities would occur. The tidewater goby can be found in Malibu and Topanga Lagoons. The National Park Service does not own property near these lagoons, but owns small parcels of land many miles upstream from these two lagoons. We do not expect potential sediments generated from prescribed burning or fuel modification activities to reach these lagoons in any significant

Concurrence 3 continued

amounts. The only known population of California red-legged frogs within the Santa Monica Mountains NRA occurs in east Las Virgenes Creek. The National Park Service does not own this property, nor any upstream from the California red-legged frog population.

The remaining four species, Lyon's pentachaeta, Braunton's milk-vetch, Santa Monica Mountains dudleya, and marcescent dudleya, are known to occur in limited numbers on National Park Service land. However, botanical surveys would be conducted prior to finalizing any strategic fuel reduction and ecological prescribed fire project. If these species were found, the project would be modified such that adverse effects to these species would be avoided. As indicated above, mechanical fuel modification would continue only in wildland urban interface areas near structures, which have been repeatedly cleared for many years and are predominantly non-native annual grasslands of low habitat quality that retain little or no native vegetation. Based on habitat characteristics and past land use, none of these listed plants are believed to grow in the existing fuel modification zones. In addition, the dudleya species typically do not grow in habitats where fuel modification would be necessary, such as sheer volcanic rock surfaces, canyon walls, and rock outcroppings (Service 1999).

The Santa Monica Mountains NRA fire management plan may ultimately benefit listed species by reducing the severity and extent of future wildfires as a result of the proposed fuel modifications and aiding in the control of invasive species.

No further consultation pursuant to section 7 of the Endangered Species Act of 1973, as amended, is required at this time. If you become aware of new information regarding the design or implementation of the proposed project, or if a listed species has been adversely affected by the project, we recommend that you contact us as soon as possible to assess the need for further consultation. Any prescribed burning or fuel treatment projects not specifically contemplated by your fire management plan that may adversely affect a listed species would require separate section 7 consultation under the Endangered Species Act of 1973, as amended.

If you have any questions, please contact Creed Clayton of this office at (805) 644-1766, extension 335.

Literature Cited

National Park Service. 2004. Draft environmental impact statement, fire management plan, Santa Monica Mountains National Recreation Area. March, 2004. U.S. Department of Interior, National Park Service

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Santa Monica Mountains National Recreation Area

September 2005

United States Department of the Interior – National Park Service