



P.O. Box 422, Fawnskin, California 92333
www.friendsofbigbearvalley.org info@friendsofbigbearvalley.com
909-878-3091

20 October 2021

U.S. Forest Service
San Bernardino National Forest
Mountaintop Ranger District
San Bernardino County, CA

RE: North Big Bear Landscape Restoration Project Environmental Assessment

Dear Mountaintop District San Bernardino National Forest,

Friends of Big Bear Valley (FOBBV) represents over 5000 members who are local residents or visitors to the Big Bear Valley, all of whom would be adversely impacted, both directly or indirectly, by the implementation of the North Big Bear Landscape Restoration Project. In addition, we have over 200,000 followers on social media and the live stream camera, entranced by and learning from this valley and the amazing, unique and special wildlife and plant life that inhabit it.

The Environmental Analysis for this proposed project has several major flaws and the resulting plans have been created based on erroneous analysis results and faulty assumptions. These inaccuracies must all be corrected and reconsidered and an entirely new plan created and presented.

A--The evaluation of the impact to bald eagles is grossly underestimated and the analysis and assumptions regarding bald eagle behaviors and habitats are inaccurate. Bald Eagles remain protected under the Bald and Golden Eagle Protection Act, plus are still considered Threatened Species in the state of California. Implementation of this plan would be in direct violation of these.

- 1) The plan assumes that the nesting season starts in early January, just as the eggs are laid and proposes for work to be done near the nest right up until that moment. It is well-documented that the nesting season for bald eagles starts with courtship and nest building activities. "Eagles are most vulnerable to disturbance early in the nesting period, i.e. during courtship, nest building, egg laying, incubation, and brooding (roughly the first 12 weeks of the nesting cycle)"—
<https://cbop.audubon.org/conservation/human-activity-and-disturbances-near-active-bald-eagle-nests>

U.S. F & W also suggest that nesting season includes courting and nest building. For both the current pair nesting in the project area since 2016 as well as the

previous pair, these activities have started each year in October (See Attachment A—Nesting Activity Counts, and Attachment B—Photos of Current Nesting Activities for October 2021) and can last through June.

If trail-building, prescribed fires and mechanical clearing are done right up to January, the current pair would likely not lay eggs at all and would probably abandon the area. This plan absolutely would not reduce the impacts to bald eagles. This plan cannot be implemented nesting area without severe impacts to this nesting pair. The current nesting pair is regularly in the nest even in the off-season, so this nest is active year-round.

- 2) The plans for working around roosting areas are based on mappings of roosting areas done nearly 30 years ago and updated 11 years ago—nothing current. But, there is a nesting pair here now, which was not the case even 11 years ago. In addition, the wintering bald eagles are most assuredly different individuals than 30 years ago and since 11 years ago, especially since the majority of the recent wintering eagles have been immatures, as noted by their coloration patterns, and therefore less than 5 years old. (Please reference the last few years of eagle count data done by the U.S. Forest Service.) It is an inaccurate assumption to say they roost in the same places as the previous bald eagles in the area. In addition, no analysis has been done on the roosting habits and locations of the nesting pair versus that of the wintering bald eagles. All data on bald eagle roosting must be properly collected and updated to the current situation before plans to lessen impact can be properly made or evaluated.
- 3) One of the trails planned to be moved, the Gray's Peak Trail, currently goes nicely around the eagle nesting area—the planned new location for that trail would run straight through the eagle nesting habitat! And it appears that the plan is also to now allow e-bikes on that trail. That much activity nearby has a significant chance of causing these eagles to find a new nesting site, at a minimum or leave the area altogether. (Attachment C: Current Grays Peak Trail, **light purple line**, proposed trail, **thick purple line**, runs straight through the eagle nest (**red cross**) and the known eagle roost trees, including the newly discovered roost tree NNW of the nest (**yellow crosses**).

There is already a well maintained and accessible Gray's Peak trail that starts and ends in the same area the proposed trail is to be. There is no need to create a short cut through the eagle's habitat. The proposal states, "Trail layout and construction will be designed to protect natural and cultural resources". In reality the proposed trail and work would most certainly disrupt the eagle's daily behavior and may cause them to leave the area in search of a more private location. The proposed trail through the eagle habitat appears to be within 100 to 300 feet of the actual eagle nesting tree. U.S. Fish and Wildlife Service guidelines suggest staying a minimum of 330 feet away from an active nest.

Some eagles use nests in urban areas near human activity and traffic. This is not the case with the Big Bear Valley eagles. Their nest is in a rural and quiet area, any human activity both for work and recreation will definitely affect them. The proposal notes that "If a proposed segment of the currently proposed route cannot be constructed and maintained in a sustainable manner while protecting resources,

that segment may be withdrawn from consideration.” We would ask that this segment be withdrawn from consideration.

B—The overall proposal for reducing fire hazard, the premise of the proposal is based on assumptions that have been shown in studies to be false.

- 1) The only effective way to protect homes from wildfire is to help homeowners make their homes more fire-safe (“home hardening”) and assisting homeowners with annual “defensible space” pruning of vegetation within 100 feet surrounding homes. Vegetation management beyond 100 feet from homes provides no additional benefit in terms of protecting homes from wildfires.
- 2) The largest and most comprehensive scientific study ever conducted on forest management and fire intensity found that logging and other tree removal is associated with increased fire intensity, and the more trees that are removed from forests, the faster and hotter fires tend to burn—often toward homes.
- 3) “Thinning” and other tree removal activities increase fire intensity by changing the microclimate of a forest, reducing the cooling shade of the forest canopy and creating hotter, drier, and windier conditions, while logging machinery spreads highly combustible invasive grasses like cheatgrass.
- 4) The North Big Bear Project would not only unnecessarily damage sensitive California spotted owl and Bald Eagle habitat, it would also increase the wildfire risk to nearby homes.
- 5) The Forest Service proposal would include clearcuts one acre in size each within mature pinyon-juniper forests. Again, the would increase the fire risk to homes rather than decrease it.

C--The proposal plans to expand multi-use trails by 47 miles and assumes that more recreational trails are needed in the forest surrounding Big Bear Valley, but the majority of the trails are empty during weekdays and are not overly crowded on weekends. The only crowded trails are the ones near town and this plan will do nothing to make hikers, bikers, etc., use other, less populated trails. It also fails to take into account anywhere in the document the actual impact of e-bikes on the species or habitats where they do not currently exist but would be added. There is also no designated plan for how the trails would be monitored or patrolled to be assured that only Class 1 e-bikes are using the trails, nor any plan to correct the situation if that turns out (which is very likely) to not be the case.

It would have much more beneficial recreational impact to find ways of attracting the trail-users to the more distant, less used trails without creating the devastating impact to the entire valley and its wildlife and habitats.

D—The proposal continuously states that this plan would have overall benefits, such as “Restore and protect habitats for rare and sensitive plant and wildlife species” and “Reduce drought stress to trees, and potential for uncharacteristically severe insect infestation due to vegetation densities exceeding the natural range of variation” but without offering any significant studies or proof that the actions to be undertaken by implementation of the plan would actually create those results. Without solid evidence and studies showing these results, all of the disruption that would be caused by this plan cannot be evaluated and the plan cannot be undertaken.

We sincerely hope that you will take all of the actual circumstances and potential irreversible consequences into consideration and make a conscious, responsible decision to completely re-evaluate this plan before deciding to implement any portion of it.

Sincerely,

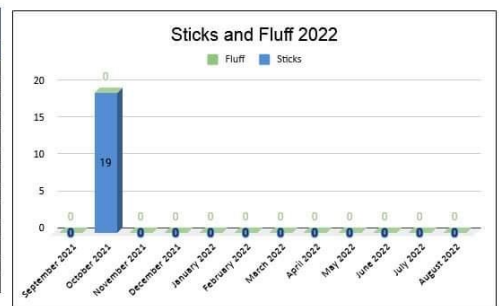


Sandy Steers
Executive Director

Attachment A – Nesting Activity Counts

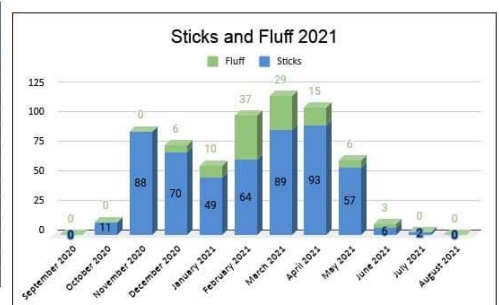
Season 2021-2022 Prey Deliveries						
Month	Total	Fish	Mammal	Bird	Unkn.	Comments
September 2021	0	0	0	0	0	
October 2021	0	0	0	0	0	
November 2021	0	0	0	0	0	
December 2021	0	0	0	0	0	
January 2022	0	0	0	0	0	
February 2022	0	0	0	0	0	
March 2022	0	0	0	0	0	
April 2022	0	0	0	0	0	
May 2022	0	0	0	0	0	
June 2022	0	0	0	0	0	
July 2022	0	0	0	0	0	
August 2022	0	0	0	0	0	
Total	0	0	0	0	0	

Season 2021-2022 Nesting Materials			
Month	Total	Sticks	Fluff
September 2021	0	0	0
October 2021	19	19	0
November 2021	0	0	0
December 2021	0	0	0
January 2022	0	0	0
February 2022	0	0	0
March 2022	0	0	0
April 2022	0	0	0
May 2022	0	0	0
June 2022	0	0	0
July 2022	0	0	0
August 2022	0	0	0
Total	19	19	0



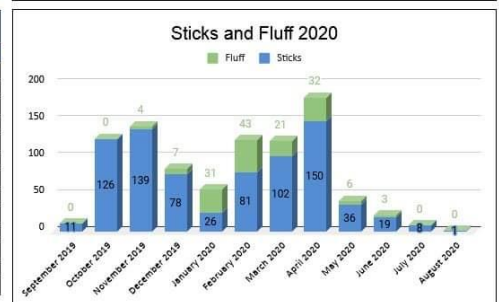
Season 2020-2021 Prey Deliveries						
Month	Total	Fish	Mammal	Bird	Unkn.	Comments
September 2020	0	0	0	0	0	cam is down through 09/27
October 2020	0	0	0	0	0	
November 2020	0	0	0	0	0	
December 2020	10	8	1	1	0	
January 2021	11	10	0	1	0	1/6, 1/9, 1/13 eggs are laid & lost
February 2021	24	20	0	4	0	2/8, 2/11 eggs are laid
March 2021	22	15	0	6	1	3/19 hatching failure
April 2021	6	6	0	0	0	4/17 raven pred. egg#2
May 2021	2	2	0	0	0	
June 2021	0	0	0	0	0	
July 2021	0	0	0	0	0	
August 2021	0	0	0	0	0	
Total	75	61	1	12	1	

Season 2020-2021 Nesting Materials			
Month	Total	Sticks	Fluff
September 2020	0	0	0
October 2020	11	11	0
November 2020	88	88	0
December 2020	76	70	6
January 2021	59	49	10
February 2021	101	64	37
March 2021	118	89	29
April 2021	108	93	15
May 2021	63	57	6
June 2021	9	6	3
July 2021	2	2	0
August 2021	0	0	0
Total	635	529	106



Season 2019-2020 Prey Deliveries						
Month	Total	Fish	Mammal	Bird	Unkn.	Comments
September 2019	0	0	0	0	0	
October 2019	1	1	0	0	0	
November 2019	0	0	0	0	0	
December 2019	5	3	1	1	0	
January 2020	10	9	0	1	0	01/08, 01/11 eggs are laid
February 2020	15	14	0	1	0	
March 2020	10	9	0	1	0	03/15 eggs broken by ravens
April 2020	17	16	0	1	0	
May 2020	0	0	0	0	0	
June 2020	1	1	0	0	0	
July 2020	0	0	0	0	0	
August 2020	0	0	0	0	0	
Total	59	53	1	5	0	

Season 2019-2020 Nesting Materials			
Month	Total	Sticks	Fluff
September 2019	11	11	0
October 2019	126	126	0
November 2019	143	139	4
December 2019	85	78	7
January 2020	57	26	31
February 2020	124	81	43
March 2020	123	102	21
April 2020	182	150	32
May 2020	42	36	6
June 2020	22	19	3
July 2020	8	8	0
August 2020	1	1	0
Total	924	777	147



Attachment B – Current Nesting Activity, October 2021



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Attachment C – Current vs. Proposed Gray's Peak Trail

