

THE SESPE WILD

The Newsletter of the Keep the Sespe Wild Committee

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UPDATE on REYES PEAK LOGGING PROJECT

SEPTEMBER 2020

The comment period on this ill-conceived proposal from Los Padres National Forest (LPNF) closed on August 14th.

There were around 15,500 comments submitted to LPNF, the great majority opposed to the logging of over 15,000 old-growth conifers along the Reyes Peak/Pine Mountain ridge line.

These so-called “sky islands”, the conifer forests that are only found along the highest-elevation peaks and ridge lines of Southern California’s National Forests, are threatened by global heating, which may eventually make their habitat too hot for them to survive and reproduce.

As LPNF administrators have repeatedly stated, multiple online form letters that are identical in wording are all counted as only one comment. (This also goes for letters to Congress, as well as for letters to government agencies. The reason is that they are so easy to submit - simply by clicking on a link and adding one’s name - that they do not represent individual, informed comments.)

These form letters totaled around 14,000, which still left something like 1,500 individual written comments. Our thanks to the hundreds of KSWC supporters who were among those 1,500.

LPNF stated in mid-September that they are still going over these comments, evaluating input that will lead to a better project. No decision on the project is expected very soon.

The most detailed comments we have seen were from Carla M. D’Antonio, Schuyler Chair, Environmental Studies Distinguished Professor, Dept. of Ecology, Evolution and Marine Biology at UC Santa Barbara. She has studied Los Padres Forest for decades, and published many studies on fire and other topics in our chaparral and conifer forest environments.

EXCERPTS FROM CARLA D’ANTONIO’S COMMENTS ON THE REYES PEAK PROJECT

Given the expertise and commitment of LPNF Natural Resource staff, the Reyes Peak project could be a model for thoughtful and innovative forest management in the face of climate change. Yet in its current form, the proposed action plan is inadequate.

My comments are provided with the hope that the LPNF will withdraw the proposed actions and work to create an innovative, scientifically sound proposal for the management of the Reyes Peak region.

Overview: Currently, the proposed actions lack careful justification and sufficient detail to evaluate if they are necessary and will be effective over both short and long terms. Likewise a clear vision of desired future condition(s) is missing.

There appears to be no monitoring plan.

Information on the forest history, structure and biophysical conditions is scanty, and careful critical comparisons to other mixed conifer forests in California and the Transverse ranges are non-existent.

Lastly, the proposed actions are described in the context of out-of-date assumptions about forest functioning and concepts of ‘naturalness.’

Goal 1.2 Restoration of forest health.

There are no data provided to indicate that the health of this forest is in peril or in need of improvement and “health” is not defined.

At least three studies of mixed conifer forest suggest that thinning may have little to no effect on tree mortality during drought.

Goal 1.2.1 Reduce potential for severe, extensive stand replacing fire.

The definition of 'extensive' is not discussed here, and the implication is that very large areas would likely be denuded of trees if a fire occurred.

The Zaca fire, a nearby large fire that burned similar conifer forest (Big Pine Mountain), created a mosaic of patches with different severity.

A goal listed in the LPNF Land Management Plan that will be directly negatively affected by the chaparral portion of the project is Goal 2.1 - "Reverse the trend of increasing loss of natural resource values due to invasive species" (Part 1, page 31).

The creation of fuel breaks is known to result in non-native species invasions (Merriam et al. 2006, Potts & Stephens 2009) especially by non-native annual grasses, which can increase fire occurrence and frequency.

Unsupported assumptions about baseline and detailed conditions and 'naturalness'.

The project plan refers to the forests of Reyes Peak as being "overstocked." This unfortunate terminology is not scientifically sound and implies that there is an ideal stocking (density) that should be maintained in these forests.

This in turn implies that there is a well-established baseline for comparison to the current condition. That baseline, as presented in the project plan, is a density based on four 0.2 hectare plots surveyed by Weislander's team on Frazier Mountain in the 1930s and presented in Nigro and Molinari (2019).

a. Spatially these plots are unlikely to be representative of the large heterogeneous forested area that is to be treated in the thinning action.

b. In addition to the spatial representation problem, there is an important temporal question – why should the 1930's condition be the desired 'baseline'?

B. The proposed action 'plan' references a return to 'natural' fire regimes.

I suggest that rather than using terminology about restoring to 'natural', the LPNF should focus on "creating resilient forests of the future."

III. Lack of essential detail and temporal perspective for proposed actions: The project is lacking in sufficient detail regarding both short and long-term objectives.

A. In the short term no plans are put forth to monitor the outcome of the initial proposed actions and to follow up and remedy issues that arise during and as a result of the actions.

a. Without specific actions being written down and agreed to as part of permit conditions, the LPNF will not be able to hold their contractors accountable for incomplete or poorly completed actions or damage created by contractors during the planned actions.

B. The goal of the thinning action relative to desired forest species composition is not stated.

In fact, no data are provided on species composition within the boundaries of the proposed forest thinning area and what species will be the targets of management actions.

d. One consideration of thinning that is focused on firs or incense cedar is whether the populations on Reyes Peak are part of a unique ecotype because of the biogeographic uniqueness of these transverse range forests. If so, then thinning needs to be carefully planned so as not to contribute to degradation of populations that are somewhat rare, or are genetically unique.

Size and number of trees proposed to be cut needs to be rethought. The justification for 24 inches as the cut off is lacking. A size/age relationship should be established via a tree coring study to better support future management and to highlight the age of trees being targeted for removal.

The action plan mentions a fire return interval of 35 years, but with no supporting data.



Conifers on the Pine Mountain ridge, August 2020

KSWC COMMENTS on REYES PEAK - ERRONEOUS PROJECT PROPOSAL ASSUMPTIONS

(1) The project area has burned over the past century. The project area's fire history over the past century has actually been minimal. Dead fallen trees all across the landscape are proof of this fact.

(2) Fire suppression in the project area has stopped natural fires, leading to increased tree density. With no large landscape-scale fires over the past century, actual fire suppression in the area has been only been very limited. Therefore, current tree density is not related to fire suppression.

(3) The project proposal relies on 1930's data to assume increased conifer density in the project area. The data from the 1930's on tree density within the project area represents only a tiny snapshot, based on 0.2 acres. This is one part per 2115 (or 0.047) of the project site, hardly a scientific basis upon which to decide that 15,228 mature conifers must be removed.

(4) The project area's conifers of up to 24" in diameter all grew from seeds since the 1930's. There is sound evidence that the 24" diameter conifers in the area may in fact be hundreds of years old. Tree dating studies must be undertaken before any trees are removed.

FEDERAL COURT PUTS UNITED WATER UNDER A STRICT TIMELINE OVER THE NEXT FEW YEARS, TO DESIGN AND BUILD FISH PASSAGE AT FREEMAN DIVERSION

A judge at federal court in Los Angeles has ruled that United Water, infamous for their on-going delay tactics over the past twenty-plus years, must adhere to a strict series of deadlines through September 2022, as follows:

- (1) Sept. 18, 2020 - provide drafts for modeling the hardened ramp fish passage option. This option is the only one approved by the National Marine Fisheries Service (NMFS), the agency responsible for the recovery of the endangered southern steelhead.
- (2) Nov. 23, 2020 - provide a physical modeling work plan. Physical modeling is where a scale model of the Santa Clara River and the hardened ramp is constructed in a special warehouse, to confirm the design

works as expected under various flows.

(3) Feb. 08, 2021 - finalize physical modeling plans.

(4) March 22, 2021 - begin modeling tests.

(5) Nov. 01, 2021 - complete modeling work.

After several other steps, we come to:

(6) May 09, 2022 - provide 100% design plans.

(7) Sept. 22, 2022 - submit completed regulatory applications to state and federal agencies with oversight of the fish ladder project.

We shall keep you apprised of United's progress along this time track. We would be foolish not to expect further attempts by United to spin this process out as long as they possibly can. It is their particular specialty.

REP. CARBAJAL'S BILL FOR WILDERNESS AND RIVER PROTECTION, H.R. 2199.

Congressman Salud Carbajal (D. Santa Barbara) introduced this bill in early 2020, and it has been approved by the House of Representatives in D.C. It still must be taken up by the U.S. Senate. Its chances will be much improved in 2021 if Democrat Senators retake the majority after the November elections.

Here are some highlights of H.R. 2199's specific contents within Ventura County:

- (i) 23,670 acres of additions to the Chumash Wilderness in the north county;
- (ii) 54,036 acres of additions to the Dick Smith Wilderness (incl. into Santa Barbara County);
- (iii) 30,184 acres of additions to the Matilija Wilderness;
- (iv) 14,313 acres of additions to the Sespe Wilderness.
- (v) 14.5 miles of Matilija Creek as a Wild & Scenic River (only in Los Padres Forest);
- (vi) Sespe Creek already has 31.5 miles as a Wild & Scenic River, from near Howard Creek in Rose Valley downstream to about one mile upstream of the Los Padres Forest boundary at Devil's Gate north of Fillmore, in legislation signed in 1992. The new legislation will add 21 miles to this stretch, up to the Sespe's headwaters.
- (vii) Piru Creek already has 7.3 miles designated as Wild & Scenic, between the two dams. The new legislation adds 48.5 more miles, downstream from Piru Creek's source in Lockwood Valley.

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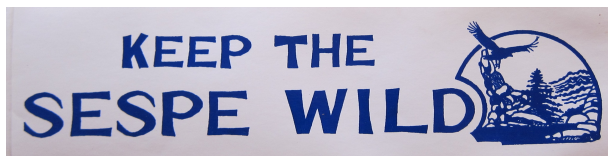
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T-shirts are 100% organic cotton fabric.

SESPE BUMPERSTICKERS: \$2 each.

Mail orders to: KSWC, PO Box 715,
Ojai, CA 93024.

Allow a few weeks for delivery. Thank you.



Local wilderness artist Robert Wassell floating a pool amidst the lower Sespe Gorge in July 2020.

Here is the sign posted now on the Paradise Rd. concessionaire kiosk, to stop visitors being charged for parking in undeveloped areas. We thank Los Padres Forest & the Sierra Club for helping us see it posted at long last on the kiosk.

**DAY USE FEES ARE NOT
REQUIRED**



**For roadside parking outside of
developed Campgrounds or Day Use
Areas**

