

Concerns about the proposed integration recommendations

April 19, 2010. The notes below were personal notes that I prepared to assist me in the discussion at the April 15 JAG meeting of the integration committee's recommendations. We did not get to many of the items that I felt needed to be amended. I hope that it will be helpful to progress at our next JAG meeting to see these comments in advance. I stress that these are notes prepared for myself; so they are often short and with very little information.

One of my major concerns is to ensure that even-age management only occurs in the context of research and demonstration, and then only when the benefits of the research or demonstration justify the ecological and social costs incurred.

A second major concern is that landscape allocation for research should be tied directly to the research projects formulated to support the Centers of Excellence and that the diversity of conditions on the landscape should arise from the requirements of the research. There should be no creation of diversity for diversities sake, to support unspecified future research.

These concerns are reflected in the points below. Changes in text are tracked and show in red (on my computer).

Integration Committee Composite File 2

Page 1 Overarching Goals

Need to include a version of Goal 2 – Forest restoration

Original Goal #2 – Forest Restoration: Work towards active restoration by managing the forest to enhance forest health and productivity.

Proposed Goal #2 - FOREST RESTORATION: Manage the forest to promote and enhance forest health, ecological processes, and productivity, with emphasis on restoring forest habitats of native flora and fauna that have regionally diminished.

To make consistent with the recommendations of the research committee, revise Goal 4:

TIMBER MANAGEMENT: Manage the forest on the sustained yield principle, defined as management which will achieve continuous yields of high quality timber products that contribute to local employment and tax revenue, consistent with environmental parameters related to watershed, wildlife, fisheries, and aesthetic and recreational enjoyment and constraints related to ~~implementation of the research program. providing a diverse, dynamic matrix of forest habitats and seral stages for researchers~~

Page 3 Demonstration

Demonstration

Not a lot has been discussed about the differentiation between Research and Demonstration. The Integration Committee generally felt that Demonstration Projects should be largely the jurisdiction of management given the following guidelines:

1. Demonstration projects that involve timber harvesting need to go through the THP process and through a management review process that currently involves a JAG review and should be reviewed by the research administration when available, and
2. Demonstration Projects that involve even-age management will be carried out in conjunction with approved research projects that involve even-age management or will meet the same criteria and go through the same evaluation process proposed for even-age research projects, and
3. Projects should not duplicate other similar demonstration projects, and
- ~~3.4.~~ Non-timber harvest activities should be Cal Fire operational management decisions, and

3. Demonstration Projects should:

- Provide economic analysis that is available to all interested parties
- Minimally document:
 - Goals and outcomes
 - Techniques to be applied
 - Data to be collected
 - Findings over time

Bottom of Page 3 Demonstration

Integration Committee Recommendation: The Integration Committee supports the Two Demonstration Allocations on JDSF Plan page 142. Part of the western area allocation is not designated as OFDA and would need to be redesignated as such per the recommendations of the Landscape Committee.

VT Comment: Part of the western demonstration allocation is in the Woodlands Transfer Area, and the deed restriction is not consistent with using this as a forest demonstration area. The western demonstration area should be reconfigured to be outside of the Woodlands Transfer Area.

Compilation of JAG Member Core Needs

Page 4

The need that at the bottom of page 4 is not fully satisfied by the IC recommendations:

1. Any increase in Late Seral, Reserves or Old Forest Structure Zones over and above those outlined in the Management Plan and the Settlement Agreement must be supported by peer reviewed scientific justification. Personal perceptions, preferences and desires are not adequate justification for making a change in the current management plan.

VT Comment: There was no peer reviewed scientific justification for the allocations in the management plan. Personal preferences did not drive the LC allocations. Rather they were designed to support forest goals for habitat, restoration, and recreation.

Page 6

Last half of page:

Core need not fully addressed:

It should describe what types of even-aged silviculture are to be applied on JDSF and to what extent.

Red Flag raised:

- Any implication that the desired future condition should be predominately late seral or old-growth characteristics. (*We are below 50% for Late Seral and Old Growth allocation*).

VT Comment: Allocations to Late Seral are very far below 50%. Excluding the WLPZs and including all changes recommended by the Landscape Committee, Late Seral Development acres total just under 5,000 acres, or 10% of the forest total. Inner and outer WLPZs total 6900 acres, or 14% of the forest total.

Page 9

Core Need:

- 1) Restoration of old forest ecology be one of the primary goals of Jackson Forest management and one of the Centers of Excellence of the research program. (*We agree and it is an overarching goal as adopted by JAG in November 2008*)

VT Comment: Perhaps I missed it, but I don't see that the JAG in November 2008 adopted this as an overarching goal.

Integration File 4 Landscape

Page 4

The listing of elements of "matrix land" management omitted a Landscape Committee recommendation:

Designate an average of two dominant trees per acre across the landscape to be permanently retained to develop old growth characteristics.

VT Comment: Including a component of trees in the matrix lands to return to old growth is an important environmental and public value. Recognizing that the JAG is divided on this issue, I suggest the following compromise, which will push the final decision out to future generations.

Suggested Compromise:

Designate an average of two dominant trees per acre across the landscape as potential candidates for old growth and retain them during the 40 year planning period.

Page 5 – section B

Modify the first item to eliminate "Preference to"

- ~~Preference to~~ uneven-aged management, primarily single-tree selection.

VT Comment: There should not be any loopholes for JDSF staff to use even-age management on matrix acres.

Page 7 - Allocation Alternatives in the Interim prior to the development of the full Research Plan and Structure

VT Comment: The recommendations here raise what is for me an important area where the JAG needs to be consistent in its recommendations – how allocation is to be done in the interim before the research program and associated allocations are developed. We should discuss this in the context of the Research Committee recommendations. I present here my view of consistent allocation guidelines for the interim:

1. Utilize ~~the current Management Plan Allocations (Management Plan Table 1 or 7)~~ in conjunction with the proposed Silviculture Guidelines for matrix lands.

2. Even-aged treatments are only to be conducted in support of already established research projects. in the "purple" areas in Map 5 and only by following the Silviculture Guidelines for Even-Aged Management

3. Includes all other Special Area designations as proposed by the Landscape Allocation Committee

Page 9 – Silvicultural Guidelines for Even-Age Management

Suggest the following modifications:

Intent

Even-aged management is expected to be a continuing component of operations at JDSF, within the context of a professionally-designed, research and demonstration program.

~~Initially, this evaluation would be made by JAG until alternative review processes are developed. No even-age management will take place outside of previously approved research projects until the research program is developed and operational.~~

The use of even-aged methods is to be restricted to constituting only a very minor proportion of both land area and of silvicultural approaches applied.

~~JAG-Approved Principles underlying the Guidelines in the Management Plan~~

JAG recommends adoption of the following JDSF Management Plan (page 255) as modified:

"Even-age management will only be conducted as part of a research project that supports the research goals of the forest, or to address forest health or regeneration issues where even-age treatments are demonstrably better than uneven-age alternatives."

All proposed even-aged management will be presented to the appropriate advisory entities for review and recommendation prior to implantation.

Clearcutting will be restricted to a cumulative maximum of 100 acres per decade and only for purposes of research, demonstration, addressing forest health, or addressing problematic conditions for regeneration. Up to an additional 400 acres may be clearcut per decade, but only for research purposes that cannot be met through any other method.

The total area receiving even-aged silvicultural treatments shall be the minimum required for scientific validity of the research involved. ~~not exceed 2,700 acres per decade.~~

~~In addition, even aged management will be tied to:~~

~~a) the Forest condition it is intended to produce.~~

~~b) necessity and appropriateness for accommodating research investigations either immediately or at a later time.~~

~~These constraints (i.e., a, b) do not apply to even aged management necessary for addressing forest health or problematic regeneration conditions."~~

Page 9 – Guideline Elements

The criteria are good but need to be applied in the context of the overall research program.

Guideline Elements *Note: Elements likely to be consolidated*

Criteria used by the reviewing body iesy in approving the use of even-aged methods should include:

Page 13 –Definitions

VT Comment: Substantial changes were made in the definition by the Landscape Committee of Older Forest Development Areas

Transitional characteristics of OFDAs include (*Landscape Committee recommendations*):

- ⌚ More weighted to biological characteristics that in Matrix areas
- ⌚ Timber production would first increase but then likely stabilize
- ⌚ On average over the stand, at least two dominant trees per acre, excluding WLPZs, will be retained throughout the 40-year planning period.

Landscape Committee definition: Some trees would be designated for permanent retention, giving preference to trees exhibiting late seral characteristics. The number designated for permanent retention should not conflict with the goal of maintaining non-declining timber production into the indefinite future.

VT Comment: The amended language above is offered as a compromise.

- ⌚ Trees exhibiting old growth characteristics (*changed from Landscape Committees "late seral characteristics"*) will be retained. See guidelines in Plan p. 104-105. All other trees will be harvested at some point in time[vt1]
- ⌚ Base level treatments will meet *Silviculture Guidelines*

Page 13 -- Matrix Lands

Silvicultural treatments will utilize the *Silviculture Guidelines* that

- ⌚ Apply conservative treatments to maintain stands having future options for diverse goals.

Research Committee Document as modified

VT Comment: I agree with most of the recommendations here, except those that refer to the interim and to the organization for research.

Page 4

Recommendation #3: ~~Establish a Science Committee~~An early task of the research organization in cooperation with JDSF staff should be to develop details on

a spatial land allocation on JDSF that supports research to:

- improve understanding of underlying processes and functions,
- enable long-term ecological studies, and
- support the Centers of Excellence.

Page 5 – interim management

VT Comment: The recommendations for interim management need to follow the principle that matrix lands will be managed using the matrix silvicultural guidelines until the research program is designed and the Scientific Landscape Planning Process allocated specific stands to research projects.

Until such time as a Landscape Analysis is completed, we recommend that all timber harvests in matrix lands use the matrix silvicultural guidelines, proceeding with the existing management Plan (as modified by other JAG recommendations) as an interim management system that will also, This will, in part, generate the revenues needed to fund ~~this effort,~~ the Landscape Analysis.

Page 5 – Diversity of Stand Structures

VT comment: How allocation for research should be done has been a central controversial issue since before the MP was approved. The central tenant of the MP in support of its landscape allocation was to provide “a wide diversity of conditions across the forest in support of future unspecified research.”

Such an approach makes little sense. It would do ecologically damaging management to provide conditions that might never be used by any researchers. This issue was brought before the Science Workshop. Only Kevin O’Hara supported this approach. All other participants who spoke rejected this approach. I have again reviewed the Science Workshop on this topic, and the participants were clear in recommending that detailed landscape allocation be done in the context of answering defined research questions. During this review, I created an additional excerpt beyond those I showed at a previous JAG meeting. You can see the new excerpt at:

<http://www.youtube.com/watch?v=lqHIHPXRH8Y>

This segment begins with Mike Liquori talking about how the morning session discussed the issue of ensuring there was sufficient diversity of conditions across the landscape to support the research program. Seeing this segment alone, it might be inferred that the participants in the morning supported creating diversity for its own sake. The segments I showed at the February JAG meeting showed that only Kevin O’Hara supported this policy. The other participants in the discussion rejected it in favor of tying allocation to specific research projects.

A basic principle should be adopted by the JAG that recognizes the advice of the Workshop participants and the argument made by the research committee for the benefits of a comprehensive Landscape Analysis process to determine land allocations in support of research.

Recommendation 5 should be replaced in its entirety with this principle:

Recommendation #5: Allocation of the landscape for research should be done to support answering specific research questions that are formulated as part of the overall research program based on chosen Centers of Excellence.

~~Provide and maintain over time a diversity of stand structural conditions across the landscape to ensure that current and future researchers will have varied conditions upon which to conduct research and demonstrations. This allocation will, at least initially, have similar proportions of structural conditions to those indicated in the JDSF Management Plan Table 1 (Table 7).~~

VT Comment: The middle paragraph on p. 5 needs a major rewrite.

Table 7 is not needed as an interim. Rather propose that JAG recognize that there currently exists sufficient stand diversity so that no near-term actions are required to enhance or maintain diversity. Wait for the research allocation process to yield results:

Recommendation #5a: There currently exists broad diversity in Jackson Forest; therefore, management of land specifically to support research should wait until the research program is defined and the Landscape Analysis process is completed.

The last paragraph on page 5 needs a major rewrite.

Page 6

Revise:

Thus, we favor a short-term constraint that defines stand structure by some young, mid, old seral class definition. ~~We thus recommend that JDSF staff should utilize measures (and practices) that ensure sufficient diversity for a wide range of research continuums both among stands and at a sub-stand (sub-plot?) scale.~~ We also recognize that a science-based landscape planning process would substantially help to inform this issue.

Page 8

VT Comment: I strongly support the original research committee proposal for a semi-autonomous, non-profit-research collaborative, funded (in part) by JDSF revenues. I think the committee structure is a route to failure. P. 8 in revised document; p. 7 in original.

Recommend reverting to the original recommendation of the Research Committee to replace Recommendation #8a:

Recommendation #8a: The Research Cooperative should serve as the center for research administration, and adaptive management. The Cooperative should be semi-independent of, but collaborative with CAL FIRE.

~~Appoint a broadly-based, semi-autonomous~~

~~Advisory Committee to CAL FIRE and the State Board of Forestry to administer a research, demonstration, and monitoring program for JDSF and other State Forests.~~

Page 10

VT Comment: Recommendation #9 needs to be reworded. It leaves out support of the goals for the forest and the goals for the research program. I'm not sure how it would be done operationally.