

## **Documents Obtained from Jackson State Forest that Bear on Actions of CDF and the Board of Forestry To Permit Continued Logging in Jackson State Forest Under the 1983 Management Plan**

July 25, 2001

“The most recent [management] plan was prepared in 1983 with an intended effective period of ten years. This plan does not reflect current legal, social, or economic concerns,” *JDSF Resource Assessment Budget Change Proposal (draft)*, May 7, 1994.

### **Introduction**

Attached are three internal documents of the California Department of Forestry (CDF). Statements by staff of Jackson Demonstration State Forest (JDSF) in the first two documents directly and dramatically contradict CDF’s recent public contentions that the 1983 Management Plan for JDSF is adequate today. A third document shows that CDF recognized in 1995 the danger of a legal challenge to continued timber harvesting in JDSF under the outdated 1983 Management Plan.

These documents bear importantly on the joint efforts of CDF and the Board of Forestry to circumvent a May ruling of the Superior Court of Mendocino County. In that ruling, Judge Henderson found that continued logging under the 1983 Management Plan violated the requirement of the Board of Forestry that timber operations in state forests conform to a “current management plan.” He found that “Even a casual review of the [1983] Plan reveals that the conditions on which it was developed eighteen years ago have changed dramatically.” He also found that further logging under the 1983 Management Plan was likely to result in “substantial and possibly irreparable harm” to the environment. Based on these findings, he issued a Preliminary Injunction that halted further logging under the existing management plan. The language of his decision left no doubt that he would rule to make the injunction permanent when he issued his final ruling.

Evidently for the last several months CDF and the Board of Forestry have been discussing how Board could assist CDF to undercut the court ruling. No public notice was given of these discussions or intentions until two items signaling this intention were posted on the agenda for the Board of Forestry meeting of July 12. The agenda became public two weeks before the Board meeting, but the language of the proposed actions was not publicly released until two days before the July 12 meeting – to be held in San Bernadino!

On July 12, the Board of Forestry amended its policies to remove the requirement that state forests operate under a “current management plan,” ignoring requests by the Campaign, the Sierra Club, Timber Watch and Representative Virginia Strom-Martin to delay the hearing to allow more public comment and until it could be held closer to Mendocino. The Board considered but postponed action on a resolution to authorize continued logging in Jackson State Forest under the 1983 Management Plan.

The wisdom of those who pushed for a deferral of Board action is validated by the release to the public of the CDF documents contained herein. These documents, which provide essential context for judging the current efforts of CDF and the Board, were obtained by the Campaign through a Public Records Request on July 13, a day after the July Board meeting.

Together these three papers presented here show how ill considered and ethically questionable was the Board of Forestry's hasty action to remove the requirement that state forests operate under a "current management plan."

They make completely indefensible a proposed action before the Board to explicitly authorize continued logging in Jackson State Forest under the 1983 Management Plan.

### **The Papers and Their Significance**

#### ***Document 1: Department of Forestry and Fire Protection BCP [Budget Change Proposal] Concept Paper, JDSF Resource Assessment BCP, Draft, no author listed, 5/7/94***

The first attached document was created when JDSF was in the initial stages of planning to revise its 1983 Management Plan. Although the specific purpose of the document is to recommend a budget addition for forest inventory development and analysis, the document broadly addresses the requirements for a modern management plan for the forest and concludes that the 1983 plan "does not reflect current legal, social, or economic concerns" (see the quote at the top of this document). Note well that 7 years have passed since this conclusion was stated by JDSF staff.

Legal counsels for CDF and the Board of Forestry argued at the July Board meeting that there had been no significant changes in the forest or its surrounding context since 1982, when an Environmental Impact Report (EIR) for timber operations in Jackson State was prepared, and therefore that continued logging under the 1983 Management Plan was completely acceptable. These assertions were authoritatively refuted by the knowledgeable staff of JDSF seven years before they were made!

A note on authorship: Although no author is listed, this document was found in a file folder of papers by John Griffen, a senior staff person of JDSF and at that time responsible for the forest inventory system. It seems probable that Mr. Griffen was the primary author of this paper.

#### ***Document 2: Re: Gary's June 10 Mgt. Planning Package, June 14, 1994, John Griffen***

This paper was created when JDSF was in the initial stages of planning to revise its 1983 Management Plan..

The author of the paper is John Griffen, who began working at JDSF in 1977.

Mr. Griffen coordinated preparation of the 1983 management plan, oversaw preparation of forest inventories for many years, and was in charge of the timber sale program from 1984 or 1985 until recently. He is arguably the most knowledgeable of all the current JDSF staff about the history of management planning and timber operations in Jackson State Forest.

Mr. Griffen's intimate knowledge of JDSF and his long and dedicated service on its behalf make his indictment of the 1994 management planning process a compelling one. I refer readers especially to Section 6, where he says,

"... we have been told that the plan that should carry this forest into the next century will be guided by policies from the dark ages of American forestry, policies that will be 17 years old when the plan is drafted [1995] and will be nearly a quarter of a century old when the new millennium arrives."

The "policies from the dark ages" are those embodied in the 1983 management plan.

Mr. Griffen minces no words in his condemnation of the refusal of the Sacramento staff of CDF to allow JDSF staff to reconsider the principles used to guide management of the forest:

**“Even the most backwards, irresponsible, timber-mining private forest landowner would see the need to reevaluate its company’s guiding principles at least once every 17 years.”**

The nascent 1994 planning effort died within a few month and was not resurrected until the Campaign’s lawsuit spurred a new attempt in 2000. CDF continued logging under a plan created in the “dark ages of American forestry” for six years beyond 1994 without any serious effort to bring it up to date.

We have now reached the millenium which was still six years away when Mr. Griffen wrote his condemnation of the outmoded principles governing management of JDSF. If we were not witnessing with our own eyes and ears CDF’s attempt to justify continued logging under a management plan that was condemned by its own staff six years ago, it would be scarcely believable.

The importance of Document 2 goes far beyond the efforts to continue logging under the 1983 plan. The date of Mr. Griffen’s memo could be changed to 2000 and would be equally applicable to the process used to create the current draft management plan. His description of public involvement (Section 1) captures exactly the reality of the year 2000 “public” scoping sessions. Ditto for his criticism of other-agency involvement (Section 2). Mr. Griffen didn’t know much about CEQA, but apparently neither did those who drafted the current plan (Section 4). The current forest inventory system is inadequate for long-range resource planning and suffers from serious unanswered questions about its reliability – inadequacies that have still not been addressed because of the lack of staffing resources that Mr. Griffen bewailed in 1994 (Section 5).<sup>1</sup> Finally, Mr. Griffen’s passionate plea for a development of new guiding policies for the forest (Section 6) is even more poignantly applicable today than it was in 1994. Although paying lip service to new planning concepts, the new management plan endorses the same “dark ages” industrial timber production as the old one.

### ***Document 3: Management Plan Status, memo from Jon Rea, 4/4/95***

This memo alerts state forest managers:

**“Recently JDSF has been under pressure by emerging local environmental groups for not having a current management plan approved by the Board of Forestry. It appears that litigation could result because this Board policy was not followed.”**

The memo goes on to say that Director Wilson had informed the Board that JDSF “will start planning for the new management plan after December 1995.” CDF, however, did not follow through on this promise to the Board.

This memo shows that CDF in 1995 had investigated the legality of continuing to operate under its 1983 Management Plan. It apparently concluded that there were real legal dangers in “not having a current management plan approved by the Board of Forestry.”

Given this 1995 memo, CDF has no basis for contending surprise over the 1990 lawsuit filed the Campaign to Restore Jackson State Redwood Forest in June 1990 nor the court ruling halting logging.

This memo is especially relevant in the context of the recent action of the Board of Forestry to amend its policies (at the request of CDF) to eliminate the requirement for “a current management plan.” Why did this phrase suddenly become so abhorrent that the Board clambered all over itself in its haste to eliminate it at its July 2001 meeting -- without giving the public any meaningful opportunity to participate? (The change was made at a Board meeting in San

Bernadino only two days after the first draft of the proposed change was released to the public). Why didn't CDF request a change in policy back in 1995?

The answers couldn't be more obvious. The requirement of having a "current management plan" was considered a reasonable, flexible standard – until Judge Henderson ruled that an eighteen-year-old management plan was not "current." The only supportable explanation for the hasty action of the Board of Forestry to remove the "current" requirement was its complicity in a joint effort with CDF to undercut the basis for Judge Henderson's Preliminary Injunction.

### **Conclusion**

For CDF and its governing Board to combine to circumvent any action of a California court is unseemly at best. In the present case, the actions of CDF and the Board are completely indefensible. CDF is the agency charged with protecting California's forest resources and the Board is responsible for seeing that CDF lives up to its obligations. Judge Henderson said, "Even a casual review of the [1983] Plan reveals that the conditions on which it was developed eighteen years ago have changed dramatically." He also found that further logging under the 1983 Management Plan was likely to result in "substantial and possibly irreparable harm" to the environment. Given their legal responsibilities, CDF and the Board should be doing their best to enforce the courts ruling, not working together to overthrow it.

The CDF documents herein authoritatively refute the tenuous arguments that CDF has been making to the Board of Forestry in support of renewed logging in Jackson State Forest. The Board has no legitimate basis for authorizing continued logging under the 1983 Management Plan.

### **Afterward**

What is apparent to all, although vigorously denied by CDF and the Board of Forestry, is that the attempt to circumvent the court is purely mercenary. Timber revenues from Jackson State Forest have in recent years funded the Forest Resources Improvement Fund (FRIF) to the tune of about \$15 million per year. The FRIF contains a number of programs highly valued by CDF and its client interests, including timber subsidies (favored by private timber owners), research grants on forestry (favored by the University of California), urban tree planting (favored by the governor), funding for state forest operating budgets (favored by CDF), etc.

CDF chose to ignore the legal handwriting on the wall when the Campaign to Restore Jackson State Redwood Forest filed its lawsuit in June 2000. It made absolutely no efforts during the current budget cycle to obtain funds for FRIF from the general funds of the state. Either CDF's legal counsel failed to tell CDF management of the strength of the Campaign's legal case, or management buried its head in the sand. So, late in the budget cycle, after the electricity crisis had drained the state's coffers, CDF was completely unprepared for even a short halt in logging Jackson State.

Although CDF and the Resources Agency (the parent of CDF) apparently considered various alternatives for obtaining funds for FRIF, in the end they decided to put money ahead of their responsibility to safeguard public trust resources and even ahead of respect for a court of the state.

This episode is only the latest and most dramatic example of the harm caused by treating Jackson as a source of revenue for the state:

- CDF in Sacramento has perennially starved JDSF in order to get more net revenue for its favored programs. JDSF has never been allowed a staff sufficient to provide modern management for the forest.

- The lack of an updated management plan can be traced directly to the inadequate staffing of JDSF, so that all resources needed to be devoted to “getting out the cut” set by CDF in Sacramento.
- In the last half of the 1990s, JDSF exceeded its legally mandated maximum level of timber harvesting in every year – in spite of internal warnings that harvesting needed to be restricted to stay within the allowable cut. This deliberate violation of its own and Board policy is directly attributable to CDF Sacramento’s perceived needs for greater revenue.

The financial incentives need to be removed from the management of Jackson State Forest. The first and most important step would be to move the funding of FRIF from Jackson State to the general fund.

Funding FRIF from general revenues would place FRIF programs on an equal basis with other state programs, as they should be. It would prevent future funding problems arising from unpredictable drops in redwood prices and decreases in permitted logging caused by new environmental constraints.

Most importantly, funding FRIF from general revenues would eliminate the present incentives for CDF to maximize its net profits from Jackson State in order to meet funding commitments. These incentives have caused CDF to manage Jackson State Forest like a profit-driven corporation instead of a guardian of valuable public-trust resources. Removing these perverse incentives would allow CDF to develop a new management plan and prepare an Environmental Impact Review (EIR) in a deliberate and thorough manner, allowing adequate time for full public participation.

To entirely remove the profit motive from the management of Jackson State, the state should mandate that all revenues generated by logging in Jackson State be spent within Jackson State, and that the level of logging be restricted to that required to fund a program to repair past environmental damage and facilitate restoration of the forest toward old growth. Then, the financial incentives would work to enhance the forest – as should they should for a publicly owned forest.



Vince Taylor

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<sup>1</sup> The request for additional staff and contract money made in the Budget Change Proposal (first paper of this compilation) was denied.

draft 5/7/94

DEPARTMENT OF FORESTRY AND FIRE PROTECTION  
BCP CONCEPT PAPER

JDSF RESOURCE ASSESSMENT BCP

Issue:

Forest management for Jackson Demonstration State Forest (JDSF) is becoming more complex with time. There is a greater requirement to develop and maintain an ever more complex and changing inventory of resources upon which land management decisions are required to be made. JDSF is not staffed to develop and maintain a complex resource inventory.

Strategic Plan:

The Department's plan directs that forest management decisions incorporate a comprehensive approach to managing forest and watershed systems, and provide for a sustainable management of forest and watershed resources for economic and social benefits. Additional staffing to provide for the development of and maintenance of an inventory of resources upon which management decisions can be taken fits the plans objectives. The resource inventory developed and maintained by the additional staff will allow the Department to meet its Goal #2 of enhancing forest and watershed resource sustainability. The additional staff will allow the forest to work toward meeting with Goal #2 objectives 1 and 3.

Background:

The Department's management of Jackson Demonstration State Forest is becoming more complex when the following factors are reviewed:

1. The public expects more from their forests than they used to. It once was enough that timber supplies were plentiful and there were opportunities for recreational activities. Now there is a rapidly growing concern for nontraditional values, such as non-game species, sustainability of jobs and dependent communities, biological diversity, watershed management, and ecosystem management. The April 1993 Timber Summit, lawsuits over rare and endangered species, and California's Coordinated Regional Strategy to Conserve Biological Diversity show this expectation.

A more sophisticated management planning process is needed for JDSF and this planning process requires a more complex resource inventory be developed and maintained and analyzed. Currently management actions are based upon a management plan and resource inventories that focus on managing the flow of timber products over time, and other forest resources are considered only to the extent that they may be adversely impacted by timber harvesting. Little attention is provided to long-term planning.

2. Expanding and changing forest practice statutes and rules mandate information exist to assess how timber operations will impact and maintain forest resources over a 100 year time period. The forest does not presently have a forest resource inventory to accomplish what is being required.

3. PRC 4645 and Board of Forestry State Forest policy require that operations on JDSF conform to a current management plan approved by the Board. The most

recent plan was prepared in 1983 with an intended effective period of ten years. This plan does not reflect current legal, social, or economic concerns.

#### Findings:

The general need for a more inclusive, ecosystem-based forest planning; the expiration of JDSF's most current management plan; the requirement for a 100 year multi-resource assessment all mandate an extensive planning effort. For management actions to be accurate, feasible, and useful, the planning process must be supported by a resource inventory which contains current and valid information.

#### Alternatives:

1. No action. This alternative is not acceptable because it will result in the loss of revenues from timber sales which are used to support other programs in the Department.
2. Use JDSF staff to develop and maintain the resource information upon which management decisions must be made (redirection). This alternative is unacceptable because it would detract from the understaffed law enforcement program, marginal recreational program, and limited demonstration and research program.
3. Contract for maintenance and development of inventory information. This approach is not acceptable since contract development and administration for this type work is exceedingly complex and the extensive staff time for this work does not exist without hurting existing programs.
4. Add a Forester II to manage and implement a program to collect, maintain and develop information needed to comply with numerous mandates.

#### Recommendation:

##### Alternative #4

Staff - One Forester II \$80,000  
Operating 15,000  
Contracting 150,000 (over a two year period)  
Equipment 15,000 (one time)

Total 260,000

TO: HAL & NORM

FROM: JOHN

RE: Gary's June 10 Mgt. Planning Package

DATE: June 14, 1994

I hope I don't offend or anger you, but I'll preface the following comments with a reiteration of my naive belief that, as the Chief Timber Sale Officer, i.e. the plan implementer, any input I may have into the plan development is just as an interested outsider and not as some sort of actual participant in the planning process. Traditionally, management planning and forest inventory have been tasks of the Assistant Forest Manager, and as far as I know those duties have not yet been permanently reassigned to anybody else. I feel I have to keep saying this until the resources needed to conduct the planning project have been identified and committed. With that said ...

(Note: The terms "they" or "them" refer to those guys over there, you know who I mean.)

Regarding "Answers to Preliminary Questions"

1. Public Involvement - What Gary is proposing is even less than giving lip service to public involvement. If I was invited to such a meeting thinking that CDF really wanted to hear what I had to say but was going to talk for half the meeting and take comments for only an hour or so and that would be it for the whole plan then I would be unsatisfied and probably insulted. (On the other hand, it's just as likely that no one would show up at all.) I would suggest that one to two hours of public involvement is worse than no involvement at all and that we should just continue on in the knowledge that we already know what's good for the people who own this place without having to ask them.

2. Agency Involvement - It seems we should have some dialog with the decision-makers at some point in this process and figure out just how we're going to go about this thing. For example, shouldn't we talk about whether or not we should go with a HCP before letters to F&WS are written? (It looks like it's too late; the decision has already been made and the letter sent.)

It sounds like we'll do the same with agencies as with the general public: Ask if they have any concerns and then say thanks, we'll think about it. (This is as opposed to actually inviting anybody from the outside to participate in planning.) Is this the approach being promoted by the Department and the Agency for other long term, landscape level resource planning in California? I don't think so, but I guess there's probably a good reason why we want to do it differently here.

Other agencies to consult might include the Mendocino County Board of Supervisors, the USFS PSW Experiment Station, and the forestry schools at Cal, Humboldt and Cal Poly. There may also be some NGOs (non-government organizations) that have a stake in what happens here, such as environmental groups, industry groups, professional groups, business groups, educational groups, recreational groups



3. Type of Document. - This can be considered a non-answer. There is no information that will guide a plan preparer.

There's a troubling reference to "the SYP." Checking the notes from our last meeting, the consensus was that we would not do a SYP, but rather just get the information needed for MSP option a and include it in the management plan.

4. CEQA - I don't know very much about CEQA. Whoever does the plan will have to figure some stuff out. Gary's statement doesn't sound correct, that the CEQA documentation required for a management plan can be satisfied by a SYP, but what do I know? We've pretty much ignored CEQA for all our non-timber harvesting projects. Any change from that, whether related to a management plan or not, will change our way of doing business, and needs to be talked about a lot more.

5. Time Frames - We talked about it taking me three person-months to do the inventory validation work, and that it would take somebody else a lot longer because they would have to start from scratch just to understand the system. If Norm started July 1 and worked 40 hours a week he might get it done by November 1.

(I don't mean to suggest that Norm is not equal to the task. In fact I think Norm is probably one of the most capable people that could be assigned to it. If anything, I've underestimated the enormity of the undertaking. I think anyone, including myself, would have a hard time getting what we really need out of the inventory in five months, considering the minimal level of effort that has gone into it so far.)

Is it possible that the cart is being sent out ahead of the horse? Do we really need to jump on the inventory right away with a major redirection from other important program areas? Shouldn't we fully consider the feasibility of using what we have for now and improving the inventory information over time for the subsequent plan updates? If there's even a remote possibility that we'll have a new position to manage the inventory next year, why make Norm go through all the effort to learn and massage the current stuff only to have somebody else do the same thing a few months later?

Considering all that has to be done if we're going to do effective planning, and considering how few resources we have to devote to the effort, is fine-tuning the inventory the best use of those limited resources, or might they be better invested in something else?

I don't fully understand the proposed D&E program reduction and how that will allow Norm to do the requested inventory work. Would we cancel RR Gulch, tours, and half of the newsletters? After the listed reductions, does this retired annuitant then do all of the other things that Norm usually does? Is that feasible?

We still don't have any actual people assigned to any kind of defined project. Who is supposed to come up with the draft work plan? Shouldn't that be done by the project manager in consultation with some key support people?

6. Board Happiness - I guess Gary missed the point of my question. I don't really care about the mental state of those nine people, whether they're happy or sad or abuse their kids or are on drugs half the time. What I was trying to

suggest (too subtly I guess) was that we might want to consider updating the guiding policies under which this forest is managed.

The answer that Gary got could have been that we would recognize that the 1978 policy is out of date and that our planning process would include the development of new policy proposals for the BOF to consider. Instead, we have been told that the plan that should carry this forest into the next century will be guided by policies from the dark ages of American forestry, policies that will be 17 years old when the plan is drafted and will be nearly a quarter of a century old when the new millennium arrives.

Do those guys over there read the newspaper, or the Journal of Forestry, or their own memos? Do they realize that there is a major revolution occurring in forestry? Every other major public forest land management agency in the western

United States is modernizing its forest plans. Even the most backwards, irresponsible, timber-mining private forest landowner would see the need to re-evaluate its company's guiding principles at least once every 17 years. The only explanation I see for this Department's refusal to do the same is that new forestry is a hoax and only CDF can see through it.

7. Using the Old Plan - I think the 1983 plan is probably at least as good as what will come out of the process I see developing here. I say we use it until we can replace it with something better, no matter how long it takes.

8. Specificity - OK.

#### General Comments and Vituperative Spewing

Usually when embarking on a major project like this there are some meetings (more than one) among the significant players, including the project leader, to line out the things that need to be done, the order and timing of those things, who does what, what the project is supposed to accomplish, and so on (as has apparently been done for the Latour SYP). Heck, this project doesn't have any people assigned to it yet, much less a leader, and we're already starting to make decisions about how things are going to be. Our one meeting hardly amounts to much of a planning session. It all seems a little hurried and arbitrary, and not very well thought out.

I have been thinking of the process that Oregon used to develop the Elliott State Forest Plan. It was very elaborate and state-of-the-art. It was probably expensive and certainly took a lot of time for a lot of people. It no doubt suffered from the inefficiencies of too many committees and an overdeveloped bureaucracy. It was multidisciplinary, using expertise from various agencies and viewpoints. I'm sure it's more complex than would be appropriate for a dinky little outfit like us, with half the acreage but double the allowable cut of the Elliott. But by golly, when they got done they had something they could be proud of. It reflects a lot of commitment and professionalism, is certainly thorough, and is a document that they can actually use in their day-to-day management. I wish California thought enough of its biggest and most profitable state forest to do something like it here.

But instead we're borrowing people from here and there and talking about retired annuitants to do high-tech stuff and hoping for free goodies from somewhere, and what we're going to end up with will be an embarrassing piece of crap. I guess we (me) instigated this by making a lot of noise about management

planning, and maybe they think what they're offering will keep us quiet. I can't tell if this herky-jerky urgency is meant to appease us or the Board or whom. So OK, I'm willing to be quiet now and forget all about management planning. Yep, they wore me down. The management plan they seem to be willing to support is not worth doing, and I'd just as soon have nothing more to do with it.

There's a point in evaluating a proposed project when it must be decided if the project is worth pursuing or not. We seem to have passed that point without explicitly considering the option of postponing this project. It is my contention that the Department is obviously unable to adequately support a proper management planning effort for this forest, and that it should delay getting started until resources adequate to do a good job can be committed to the project. This may mean waiting for a few years until the budget picture brightens and sale revenues are again available to reinvest in the forest, and perhaps until there's a change in administration such that there is interest in, enthusiasm for, and a clearer vision of a modern management philosophy for this property.

In the mean time, continuing to do what we've been doing is going to be OK. The only thing we'll be forced into doing is developing the information necessary to comply with MSP option a, and Norm and I or whoever can probably get that done by the deadline of November, 1996.

HAL - I'M AFRAID THAT MY NEGATIVE ATTITUDE ABOUT ALL THIS MAY BE COLORING YOUR PERSPECTIVE AND PERHAPS GETTING YOU IN TROUBLE OR JEOPARDIZING THE PROJECT. IF YOU WOULD LIKE ME TO THINK MORE POSITIVELY I CAN GIVE THAT A TRY. OR YOU COULD JUST TELL ME TO SHUT UP; THAT WOULD BE EASIER.

to: HAL SLACK at MENDOCINO\_RU  
Subject: Management Plan Status

Forwarded

from: JON REA at SAC\_RES\_MGMT 4/4/95 12:59PM (2600 bytes: 1 in) to: BOGGS MTN STATE FOREST at LAKE\_NAPA\_RU, LATOUR STATE FOREST at HASTA\_TRINITY\_RU SOQUEL STATE FOREST at SAN\_MATEO\_SC\_RU, MTN HOME STATE FOREST at TULARE\_RU, JACKSON STATE FOREST at MENDOCINO\_RU  
Receipt Requested  
cc: LEN THEISS at RCC-ADM, ED WRISTEN at TULARE\_RU, RAY HEBRARD at MENDOCINO\_RU  
subject: Management Plan Status

Message Contents

next item 1: Text\_1

Forest Managers:

Recently JDSF has been under pressure by emerging local environmental groups for not having a current management plan approved by the Board of Forestry. It appears that litigation could result because this Board policy was not followed. Today, Director Wilson submitted a letter to the Board stating that JDSF is validating the last inventory and will start planning for the new management plan after December 1995 and completion of the inventory validation process. He further stated that JDSF will continue using the existing plan for guidance and will conform with other new regulations requiring protection of public trust resources as well as new forest practice regulations until the new management plan is adopted by the Board.