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### Jackson Forest RDEIR Alternative G

Dear Board Members:

Thank you for the opportunity to comment on behalf of California Sierra Club on the new Alternative G in the Recirculated Draft Environmental Impact Report (RDEIR) for management of Jackson Demonstration State Forest (JDSF). As you know, I have been following Jackson-related issues since about 1996. I hereby incorporate by reference the letter dated February 27, 2006 which I sent on behalf of Sierra Club regarding the Draft EIR (DEIR). If the final EIR document is to make sense, many of the criticisms that I addressed about the DEIR, particularly the erroneous nonsense in some of the map figures like Map K and Map R, just for example, must be fixed.

This letter is also in addition to the letter I signed with others calling ourselves the Mendocino Working Group, which was submitted to the record earlier. The concerns raised in that letter are a consensus effort of representatives of the local timber industry and environmental community to identify some concerns we hold in common.

#### **Additional Information is Needed**

Some of the informational requests I made in Sierra Club's previous letter have been included or partially included in Alternative G. Map Figure 2 of Alternative G does provide a useful visual representation of where stands that contain more old large trees are located. It would have been even better if you had also included the map you generated and handed out to various members of the public dated April 27, 2006 entitled "Second-Growth Stands Regenerated Prior to 1926." The combination of this map and Map Figure 2 provide a much more complete representation of the older second growth stands at Jackson that the conservation community is particularly concerned about than either does alone. Given that this information is needed to make the most informed decision about management at JDSF, the RDEIR is incomplete without it and it should be included in the Final.

The language in Alternative G's first Goal and Objective section illustrates one of the reasons why the most complete information on older forest stands is important:

**Goal #1 - RESEARCH AND DEMONSTRATION:** Improve the amount and quality of information concerning economic forest management and timber management, forest ecosystem processes, watershed processes, performance of forest protection measures, that is available to the general public, ~~small~~ forest landowners, resource professionals, timber operators, and the timber industry, and researchers.

Objectives:

Maintain a diverse, dynamic matrix of forest habitats and seral stages to provide a broad range of forest conditions available for research and demonstration.

Make the State Forest available to educational institutions and other agencies for conducting research and demonstration projects.

Conduct resource management demonstrations and investigations directed to the needs of the general public, small forest landowners, resource professionals, timber operators, and the timber industry.

Design a range of demonstrations and comparisons to serve a broad set of clients such as conservation-oriented, restoration-oriented, small landowner, and intensive production approaches to forest management.

To be able to achieve Objectives 1 and 4 above, the RDEIR must include the known relevant information about older forest stands. Without the stand harvest history information, one can only speculate why the forest stands within the Camp Three and Brandon Gulch THPs outlined in Figure 2 are more dense with larger trees than are the stands adjacent on the northeast, southeast and west as indicated in Figure 2. However, a quick look at the 4/27/06 "Regenerated Prior to 1926" map indicates that those denser stands were "not harvested" since at least 1926, while the neighboring stands were "partially harvested" since 1926. This is useful information for anyone trying to design an experiment about or within older forest, and for those who are trying to determine where to locate late seral development areas or old forest structure zones, both of which are categories that are designated in the RDEIR.

An EIR is supposed to be a public disclosure document that assists the public in determining the environmental effects of proposed government action. Thus, the public should not need to come into the process with copious personal knowledge about why certain actions have been taken. The EIR is supposed to adequately describe the setting and provide information about proposed

actions and their effect on the environment. The RDEIR fails in these tasks on a number of counts:

It uses an overly broad region on which to base its statements about the regional condition of older forest stands, so the RDEIR understates how important the older forest stands at Jackson are to the regional ecology.

It fails to explain why the Camp Three and Brandon Gulch areas have not been designated for “late seral development” even though they appear to be obvious candidates for inclusion: These THP areas are adjacent or in close proximity to an existing late seral development area which would enhance the utility of the area to regionally rare wildlife and would maintain an existing old tree corridor; The forest stands in these THP areas are rare even in the context of Jackson (Map Figure 2 indicates both areas as growing 15-20 trees per acre greater than 30” diameter at breast height (DBH)); And these areas have not been harvested for at least the last 82 years according to the 4/27/2006 map that has not been included in the RDEIR. Yet the RDEIR provides no rationale for logging them as proposed, nor for failing to designate these areas for “late seral development.” Through personal knowledge I understand why decision-makers wish to designate these areas for immediate harvest. However, I have never personally understood, nor has there ever been an adequate justification for why these areas have not been designated for late seral development and nothing in the RDEIR provides any information about that. This is significant information and it is missing in the RDEIR.

### **Old Forest Structure Zone**

The Old Forest Structure Zone needs work. On multiple occasions such as at public hearings and at the Mendocino Board of Supervisors, I have heard Deputy Director Russ Henly describe the Old Forest Structure Zone (OFSZ) as stretching from west to east and north to south in Jackson providing a contiguous band of old forest structure across the forest. The reality is somewhat different. The RDEIR says:

#### Establishment of an Older Forest Structure Zone (OFSZ) (D, E & F)

A 6,803 acre area of the Forest, ranging across the Forest from west to east and north to south, is designated to be managed as an Older Forest Structure Zone (see Map Figure 1). The objective of this form of management is to produce structural characteristics of older forest, which include large trees, snags, down logs, and a high level of structural diversity, across a large contiguous area that also includes existing old growth groves and areas designated for the development of late seral forest characteristics. The portions of this Zone available for timber management would be managed on an uneven-aged basis to recruit these structural conditions and wildlife habitat elements, to coincidentally grow and produce timber through careful thinnings and periodic replacement of large trees and to provide recreational opportunities.

An examination of Alternative G Map Figure 1 clearly indicates that the OFSZ as currently designated does not at any location dip south of the mid-point of Jackson Forest and except for a very limited number of locations could actually be more accurately described as “running from west to east along the northern boundary of the forest.” Why does it matter? Because the sort of old forest structure it is supposed to create would be more effective at providing both contiguous habitat and recreation opportunities if it crossed from the Noyo watershed over to the Big River watershed in the western part of the forest where existing old forest structure currently exists. Providing OFSZ south of Highway 20 would also help bridge the somewhat formidable obstacle of this major highway.

Besides the failure of the OFSZ to meet the rhetorical flourish of its description, it also fails to include some obvious locations along West Chamberlain Creek, an area that has high recreation use by people going to the Eric Swanson Old Growth Waterfall Grove. Including OFSZ along this stretch would protect an existing scenic corridor that has a lot of residual old growth trees still growing and would also provide another way to link into the Big River watershed. At 76 square miles, Jackson should be providing a number of old forest corridors to link the Noyo River drainage, the Big River drainage, and some of the smaller coastal streams such as Jughandle Creek. Considering the OFSZ will allow certain types of timber harvest, expanding the OFSZ would allow Jackson to cultivate the high quality mature timber that the City of Ft. Bragg has asked you to develop for future harvest.

The RDEIR should also clarify what is intended in “late seral development” zones as compared to “old forest structure zones.” The intended differences are not clear in the document.

James Creek area is another place where the OFSZ should be reconsidered. The designation of the isolated and terrifically steep easternmost edge of the ridge as OFSZ is not without merit, but inclusion of the area along Road 100 following North James Creek to where it meets the lovely James Creek Old Growth Grove should also be considered because the riparian area there is interesting, it leads directly to the old growth, there is a high level of visitor use from the Willits area particularly, and scattered old growth residuals leading to the old growth grove make the area a good base for the OFSZ.

### **Jughandle Ecological Staircase Marbled Murrelet Critical Habitat**

The headwaters of Jughandle Creek are another area that the EIR should pay closer attention to. This area is adjacent to Jughandle State Park, which includes the unique-in-the-world “Ecological Staircase” where in a relatively short walk one can proceed through very different forest cover types that arise due to the changing underlying geology. Much of the Pygmy Forest part of the staircase, which is unique to the Mendocino Coast, is located on Jackson and is managed by CDF and State Parks jointly as the Pygmy Forest Preserve. The Pygmy is adjacent to the final step in the ecological staircase, located on

Jackson, and it is a forest stand that, according to RDEIR Map 2, has 12-15 trees per acre greater than 30 inch DBH and has only been “partially harvested” since 1926 according to the 4/27/2006 map. Yet this unique area is slated under Alternative G for near-term timber harvest as the south unit of the Mitchell Creek THP. This is literally the only location on earth where this stair-step condition exists and except for its final step it is already protected. If this is not a unique resource that shouldn’t be disturbed I would be hard pressed to describe what is. Additionally, the US Fish and Wildlife Service has published its intent to continue to designate this area as Critical Habitat for the federal and state-listed Marbled Murrelet because of its stand condition and propinquity to known nesting marbled murrelets in the Russian Gulch watershed. The RDEIR fails to identify these issues or provide any rationale for why the forest around the headwaters of Jughandle Creek is proposed for timber harvest. This is an unidentified significant impact.

This letter, if read in conjunction with the letter from the Mendocino Working Group, identifies some of Sierra Club’s highest priority concerns with Alternative G. Most of these are the very same concerns Sierra Club has been voicing about Jackson for the last decade or thereabouts. Alternative G provides an adequate framework from which to address these concerns so for the first time there is really the possibility that a resolution to much of the controversy could be achieved. We strongly encourage you to continue to work toward achieving such a resolution.

Sincerely,

***Kathy Bailey***

Kathy Bailey  
Forest Conservation Committee  
California Sierra Club

Attachment: See fax for 4/27/2006 map