



Campaign to Restore Jackson
State Redwood Forest
43151 Little Lake Road
Mendocino, CA 95460

July 16, 2007

Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460
JDSFPublicComment@fire.ca.gov

Re: *Recirculated Draft Environmental Impact Report Sch # 2004022025 – JDSF*

Dear Members of the Board of Forestry:

I want to take this opportunity to address you frankly. Alternative G represents a great stride forward towards resolving the controversy that has shut down operations in Jackson State Forest since 2001. But, as published, it fails in important respects to provide a workable solution to restoring operations in the forest. I believe that the board and the department share my desire to see operations resume. My comments are aimed at assisting the board to make the modifications necessary to allow all parties to move forward cooperatively.

Incorporating the Recommendations of the Mendocino Working Group in Alternative G

The Mendocino Working Group provided a set of consensus recommendations to the Board of Forestry on November 30, 2006. The group re-emphasized certain points relating to the advisory committee, evenage management, and review of interim harvest plans in its letters of February 28, 2007 and June 20, 2007, but **all of the recommendations in its November 30, 2006 statement of principles constitute an inseparable whole of the group's consensus agreement. It is the consensus as a whole that provides the basis for avoiding further conflicts and delays in the resumption of operations in Jackson Forest. All parties compromised to reach a workable agreement. Deviating from this agreement risks a breakdown of the entire agreement.** As issued, Alternative G fails to fully reflect the working group's consensus recommendations. Alternative G should be revised include **all** of the group's recommendations.

I note that Mendocino Board of Supervisors unanimously voted to support Alternative G, with the modifications recommended by the Mendocino Working Group.

Research and Future Conditions

I concur with listing research and demonstration as the first goal for the forest. However, it needs to be clearly stated that R&D activities will be chosen and implemented in the context of the second and third goals for the forest: Forest Restoration and Ecological and Watershed Processes.

Do any of you doubt that the major research and demonstration need is on how to restore the ecological health of cutover forest lands?

We have had ample demonstrations of large-scale clearcutting and evaluation of their impacts. We don't need any more demonstrations of evenage management in redwood

forests. We need to develop better understanding of how to manage forests in ways that are economically viable and reverse the negative ecological and aesthetic impacts of previous industrial logging on coastal redwood lands.

With the above in mind, the first Objective under *Goal #1 – Research and Demonstration* should be:

Improve understanding of how to manage coastal redwood forests in ways that improve forest and watershed ecological health and opportunities for human enjoyment, and that are economically viable.

The current first “Objective” should be deleted:

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

This is not an objective of the research and demonstration program. Rather it relates to developing goals for future conditions of the forest, and these goals for future conditions need to be developed in the context of all of the goals for the forest: research, restoration, ecological and watershed processes, timber management, and recreation and human enjoyment. The inclusion of the above objective is particularly objectionable because it is used, without any justification, in the section on future conditions as the primary guiding principle.

The current fourth “Objective” should be modified:

Design a range of demonstrations and comparisons on **ecologically beneficial forest management practices** to serve a broad set of clients such as conservation-oriented, restoration-oriented, small landowner, and ~~intensive production approaches to forest management~~ industrial timber companies.

All research and demonstrations should be done within the context of improving understanding and adoption of ecologically beneficial management practices. “Intensive production approaches” should not be included for their own sake, but only if they serve the primary purpose of furthering ecologically beneficial forest management.

Evenage Management

Alternative G proposes performing substantial even-age and group-selection management solely to provide “a broad range of forest conditions for research and demonstration.” This is incompatible with the goals of restoration and ecological and watershed processes, unnecessary, and illogical.

There is no role for evenage management in ecologically beneficial management of redwood forests; thus there should be no need to do any research involving this management method. If research requires evenage stands as controls, there are plenty already available in Jackson Forest and even more on lands now under the control of conservation organizations.

In its letter of June 20, 2007 to the Board of Forestry, the Mendocino Working Group recommended a process for determining the extent of evenage management that could be justified for future research. This recommendation should be incorporated in Alternative G.

Group selection may have a role in ecological forest management, but it should not simply be used as a matter of course to create “future research opportunities.” The Mendocino Working Group proposed that:

Group selection plots will be the minimum size consistent with wildlife concerns and obtaining regeneration, they will only be used when justified as the most ecologically beneficial way to obtain needed regeneration and or habitat.

This principle needs to be explicitly incorporated in Alternative G.

Forest Structure Goals

The forest structure goals, as described on pages II-6 through II-8, need to be revised to reflect the preceding discussion. Even within the context of Alternative G as written, the operative statement on page II-6 is clearly unsupportable:

The major purpose of the forest structure condition goals is to provide forest stand conditions and management histories in the Forest suitable to a wide range of research investigations and demonstration opportunities, as well as a broad range of valuable habitats.

The second and third goals listed are forest restoration and ecological and watershed processes. These should be the primary determining goals for future conditions. As argued above, appropriate research and demonstration activities would be complementary to and not antagonistic to these goals. Alternative G needs to be revised to reflect these understandings. The above cited sentence should be replaced by:

Forest structure condition goals should be determined primarily by the goals for forest restoration, ecological and watershed health, wildlife habitat, and recreation and human enjoyment. Research and demonstration activities should generally be complementary to these goals. Where research requires activities that are antagonistic to these goals, these activities should be explicitly justified, be of minimum size for scientific validity, and be reviewed by the advisory committee.

Tables II.1 and II.2 need to be revised to reflect the change in goals for future conditions. The best way to do this is to provide the following footnote to each table:

The numbers in this table are subject to review and revision in cooperation with the forest advisory committee during the initial implementation period.

Initial Implementation Period

An initial implementation period is discussed beginning on page II-12. Changes in this section are essential to bring this in line with the consensus recommendations of the Mendocino Working Group. I incorporate in my comments by reference the letters and attachments from this group to the Board of Forestry, dated November 30, 2006, February 28, 2007, and June 20, 2007.

The group re-emphasized certain points relating to the advisory committee, evenage management, and review of interim harvest plans in its letters of February 28, 2007 and June 20, 2007, but **all of the recommendations in its November 30, 2006 statement of principles constitute an inseparable whole of the group's consensus agreement. It is the consensus as a whole that provides the basis for avoiding further conflicts and delays in the resumption of operations in Jackson Forest.** Alternative G should be revised include all of the group's recommendations.

Interim Period Length: An important recommendation, emphasized in the letter of February 28, 2007, should not be overlooked:

The MWG is concerned with the language suggesting the initial period will sunset no more than 36 months after approval of the Forest Management Plan by the

Board. We agree that 3 years should be more than adequate to bring this to resolution, but we don't feel a specific ending time for the initial period should be set. ... The initial period should continue until the revised plan is submitted to and approved by the Board of Forestry.

A fixed deadline could create perverse incentives to delay the development of a revised management plan. Please amend Alternative G as above.

Interim Period Harvest Limitations: The Working Group proposed and reemphasized in its letter of February 28, 2007 that interim harvest should be limited to generating the amount of revenue needed:

to restore and enhance staffing, remedy the more significant environmental problems on the forest, initiate a wildlife inventory, a botanical inventory and generate a reviewed and verifiable forest inventory...

Alternative G does not contain any reference to limiting harvest during the interim as recommended. This limitation on harvest amount is a key part of the group's consensus agreement and should be explicitly stated within Alternative G.

Interim Harvests: The working group restated its understanding of the kind of harvesting that should occur in the interim period in its letter of February 28, 2007:

Our proposal for this initial period envisioned low impact harvesting in non-controversial areas.

Not all of the proposed harvest plans in Table II.3 are in non-controversial areas. All potentially controversial plans should be mandated to be reviewed by an advisory entity, preferably the advisory committee for Jackson Forest, as proposed by the working group in its letter of June 20, 2007.

In Conclusion

Jackson Forest has been subject to increasing controversy for over a decade and had its timber operations shut down since 2001. All parties are close to agreement on a plan and process for resuming operations and minimizing controversy. I urge the board to use its authority to make the few but essential changes needed to move forward cooperatively.

Sincerely,

Vince Taylor, Ph.D.
Executive Director.