

To: PublicComments@bof.ca.gov
Members of the Board of Forestry;
Members of the Management Committee of the
Board of Forestry

Subject: Authorize a complete review of the Management
Plan and EIR for Jackson Demonstration State
Forest; impose a moratorium on timber harvests

Introduction

At the September 22, 2021 meeting of the Board of Forestry, Cal Fire Director Thom Porter asked the Board to authorize a review of the Jackson Demonstration State Forest (JDSF) Management Plan. The matter, including the scope of the review, was referred to the Management Committee.

I write to ask the Management Committee and the Board to authorize a full review of the Management Plan and accompanying EIR and to place a moratorium on all timber harvesting in JDSF until the Management Plan and EIR reviews are approved by the Board.

Why a Full Review and Update of the Management Plan Is Needed

The Mendocino Supervisors Request a Review

On November 15, 2021 the Mendocino Board of Supervisors voted unanimously in favor of the following resolution:

NOW, THEREFORE BE IT RESOLVED, the Mendocino County Board of Supervisors urges Governor Newsom and the State's Natural Resources Agency to include any climate impacts of commercial logging on State lands in drawing up the plan to protect 30% of California's land use and coastal waters by 2030, and to publish a science-based report that evaluates carbon sequestration capacity and wildfire resiliency of

current management practices, as well as alternate management scenarios, of Jackson Demonstration State Forest; and

BE IT FURTHER RESOLVED, the Mendocino County Board of Supervisors strongly urges Governor Newsom to align Jackson Demonstration State Forest management goals with the adopted State of California climate change commitments, and to do so in a way that enhances the wide-ranging scientific, recreational and economic opportunities offered by Jackson Demonstration State Forest.

The BOF should honor the desire of the governing body of the county in which JDSF is located.

2016 Management Plan Is Out of Date

The Management Plan labeled as 2016 is actually the 2008 Management Plan. It is thirteen years old and out of date.

The 2016 Management Plan is out of date according to BOF policy (0351.10), which requires "a thorough review of each existing management plan at least every 10 years."

The body of the 2016 Management Plan is **identical** to the body of the 2008 Management Plan.¹ I emphasize **identical**, even for subjects that one would expect to have been updated. For example, these identical paragraphs appear in both the 2008 and 2016 plan:

At the time this Plan is being completed, the CAL FIRE director and Board are in the process of establishing a charter and membership composition for a Jackson-specific advisory body. . .

By 2016, the charter and membership for the advisory body were far in the past.

¹ The 2016 Management Plan includes and two appendices not in the 2008 Management Plan: a Research Plan and a Recreation Management Plan. Neither of these relate to timber operations at JDSF. Otherwise, the two plans are identical.

2016 Management Plan Fails to meet BOF Policy on Short Term Harvest Schedule

Table 9. Short-Term Harvest Schedule is the same in both the 2008 and 2016 plans. It has not been updated since 2008 and is 13 years old. **The harvest schedule in the 2016 MP therefore fails to meet the BOF policy 0351.4 B:**

. . . Timber harvesting schedules should be projected at least ten years into the future,

2016 Management Plan Fails To Meet BOF Policy on Use of Current Inventory Data

BOF policy 0351.4 B. states:

. . . the allowable cut levels must be based on pertinent current inventory and growth data . . .

A major inventory measurement was completed in 2017. The 2107 inventory reduced the estimated conifer volume per acre from 52.2 MMBF/acre to 47.0 MMBF/acre. The 2017 inventory was not available at the time of the 2016 Management Plan preparation.

2016 Management Plan Has No Consideration of Climate Change

Because 2016 Management plan is actually the 2008 Management Plan, it was created before climate change was a policy priority. This is reflected in the absence of any consideration of how climate change should affect timber harvesting and silviculture.

Here is the entirety of the 2016 Management Plan's discussion of the effect of climate change on JDSF operations:

JDSF's approach to climate change may be described by three factors: monitoring, mitigation and adaptation. Monitoring will be accomplished through repeated vegetation inventories with growth and mortality analyses along with weather station data capture. **Mitigation will be accomplished by increasing our standing inventory and sequestering carbon from the atmosphere.** By increasing our understanding of the

climatic tolerances of the species represented on the forest we may best plan for adaptation to observed climate changes. [*emphasis added*]

...

Climate change, along with geological processes, has been shaping the range and genetic configuration of redwood and associated species for millions of years. Scientists have modeled what may be near term alterations in climate, but there is a large degree of uncertainty. **There is no significant environmental climate change impact related to management of JDSF that can be predicted given the current state of scientific knowledge.** [*emphasis added*]

2016 Management Plan Does Not Evaluate Retention of Trees for Carbon Sequestration versus Harvesting of the Trees

Redwood forests are excellent at capturing carbon. Given the state's climate goals, and the 30x30 initiative, **the JDSF Management Plan needs to explicitly compare the benefits of letting trees of different types and sizes stand with those of cutting them down. The present plan does not do this.**

An analysis shows that at a price for CO₂ of \$51/tonne, JDSF produces more value with no harvest than it does with the projected harvest rate.² The price of \$51 is the interim price for the social cost of CO₂ emissions set by Biden's Interagency Working Group.

2016 Management Plan Has No Consideration of Fire Risk

The 2016 Management Plan was written in 2008, before fire risk was a major issue, and therefore it contains no discussion or comparison of fire risks associated with alternative harvest practices. Such comparisons are a crucial element of an up-to-date management plan. JDSF practices do not align with current science on reducing fire risk.

² Taylor, Vince [2021-08-30 Letter to CNR on 30x30 initiative](#)

Why the EIR Needs To Be Updated

Provisions of the California Environmental Quality Act (CEQA) require analysis of a Forest Management Plan's potential environmental impacts. Because the Management Plan needs to be updated, an updated EIR is also required.

The most recent EIR was approved in 2008, but the bulk of it was written in 2004-5. The only addition in 2008 to the 2005 version was the inclusion of management Alternative G, the one favored by the Jackson Advisory Group. This did not involve consideration of climate change or fire risk.

The current EIR is for all practical purposes 16 years old. Climate change and forest fire risk were not considered in 2005 but are important factors in future management of JDSF. An EIR needs to be prepared that includes evaluation climate change and fire risk in relation to management alternatives for JDSF.

Why a Moratorium on Timber Harvesting Is Needed

The preceding sections document the failure of the existing management plan to accord with current state goals, climate science, and fire science. **Any further harvests using the existing management plan are likely to create irreparable harm to current state goals on carbon and fire.**

Most of the local community in Mendocino County, including Pomo Tribal leaders, are united in opposition to the type of timber operations being conducted in JDSF. The local community, and many environmental organizations and people throughout California want a thorough evaluation of an alternative that manages JDSF as a preserve to support Tribal rights and to provide carbon sequestration, reduction of fire risk, biodiversity, recreation, and spiritual nourishment.

Any further timber harvesting will degrade the value of JDSF as for these purposes.

The Board should order a moratorium on timber harvests in Jackson Demonstration State Forest until the Management Plan and EIR reviews are approved by the Board.

Sincerely,

[Name]

[Street]

[City, State, Zip]