IV.15 Individual RDEIR Mailed Comments GM-1 to GM-38

This section presents responses to individual public comments (i.e., not form letter or form letter based) received the U.S. mail or other non-electronic delivery services. The responses immediately follow each letter and are organized in the same order as the comments in each letter. Several of the letters included attachments. Attachments were not included herein if our response did not directly reference the attachment.

Mailed comment submissions with multiple copies of a single letter format will be addressed in one sample from each type of form letter. Those with additional comments added will be addressed individually if the comment is substantive and thus warrants a separate response.

There will not be comment letters for every number within the series because some letters dropped if they were duplicates or if they were found to be form letters. Form letters are responded to in their own section of the FEIR.

GM-2

Giuseppe Arcimbaldo (1527-1593) / The winter, 1563, coll: Kunsthistorisch Museum, Wien / © Art Unlimited 1987

06/21/07

To the Board of forestry members:

I'm writing to you about the supplemental EIR for the Jackson State forest in Mendocino County. As a long time resident living across the highway from that forest, I've already

1 seen the terrible affects clearcutting

2 and it's damage to the wildlife and

3 streams. I fully support the Mendocino Working Group's recommendations to

4 limit cutting the trees for research

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or health reasons. Further, I personally, I u[illegible] to see all

5 logging halted [illegible] as public land.

6 It is time we focus on restoring the and all forests to robust health and to be generous to other creatures whose home it belongs to, too. Thank you

TO: THE BOARD OF FORESTRY & FIRE PROTECTION
PO BOX 944246
SACRAMENTO, CALIFORNIA
94244-2460

A 9
Printed in Holland

Mailed Letter GM-2

Response to Comment 1
See General Response 10.

Response to Comment 2
See General Response 12.

Response to Comment 3
See General Response 11.

Response to Comment 4
Support of the Working Group recommendations noted.

Response to Comment 5
See General Response 16.

Response to Comment 6
See General Response 15.

GM 3

7/2/07

To Whom It may concern,

I am writing to oppose clearcuts in the Jackson State Forest. I do not support Alternative G.

1 No more clearcuts should be made in any national forests or state forest. We must protect these natural resources for our
2,3 future, not the interests of Big Timber.

Thank You,
Piper Tipurt

Mailed Letter GM-3

Response to Comment 1
See General Response 10.

Response to Comment 2
See General Response 15.

Response to Comment 3
See General Response 17.

Cm4

EMPLOYERS COUNCIL
of Mendocino County

July 6, 2007

Board of Forestry and Fire Protection
PO Box 944246
Sacramento, Ca. 94244-2460
Attention: George Gentry, Executive Director

Re: Jackson Demonstration State Forest Management Plan & Alternative G

Dear Members of the Board,

The Employers Council of Mendocino County (ECMC) has reviewed the new Alternative G and would like to offer the following comments.

1 The Board of ECMC understands that Jackson Demonstration State Forest (JDSF) grows approximately sixty million board feet of timber per year. The original preferred alternative called for the harvest of thirty one million board feet per year, this new alternative has the target level down to twenty million board feet per year. With growth exceeding harvest at this magnitude we wonder how long JDSF can continue to be the world class research forest this new alternative is suggesting. ECMC would like to see the Board of Forestry take a serious look at what this harvest level is doing to the long term prospects of maintaining JDSF as a premier research forest. We hope the Board will commit to interacting with the scientific community to insure as time goes on if this harvest level is not appropriate for long term research it will be adjusted.

2

3 ECMC is opposed to the concept of a local advisory entity. Entities such as these can provide perspectives that are valuable tools but often lack the expertise necessary to make meaningful long term management decisions. Management of JDSF needs to remain in the hands of professionals.

4 The staff of JDSF has a long history of excellent management of the state forest. Management flexibility is crucial for any operation. ECMC is concerned that the staff of JDSF has the necessary flexibility to manage the forest. This flexibility needs to be in the form of silvicultural prescriptions, new techniques, and cutting edge demonstrations. On the ground management decisions need to be made by a team of professionals and not a system of committees and advisory groups.

Employers Council of Mendocino County ✦ 597B Main Street
Ukiah, CA 95482 ✦ (707) 462-5021 · (fax) 462-0318
www.ecmconline.com ✦ ecmc@pacific.net

The forest has been in the past an important component of Mendocino County's economic infrastructure. Our goal is to see JDSF back in production as soon as
5 possible. Our hopes are that this new management alternative is something that will provide certainty and a long lasting management scenario under which JDSF can once more be the most respected research and demonstration state forest in the nation.

Our last comment is our perception of one of the leading issues that has brought on the current situation at JDSF. The enabling legislation talks about the JDSF role in education. It is our belief if JDSF lived up to its legislative mandate and played a real role in education of the public, much of the misinformation that seems to prevail about
6 management of this forest and others would be dispelled. JDSF has a wonderful story to tell, the shame is that story is not getting out. The new alternative does not deal with any meaningful education component. If there is not a serious effort to improve the educational outreach and public interaction with JDSF there is a very real likelihood the situation of the past 5-6 years will be the norm rather than an exception.

ECMC supports Alternative G, we believe forest scientists and forest professionals need
7 to be in the forefront making the management decisions. We further hope and expect that JDSF staff will get the specific direction needed, to get started now on a meaningful sales program for 2008.

Margie Handley

Margie Handley
ECMC Chair

Employers Council of Mendocino County ✦ 597B Main Street
Ukiah, CA 95482 ✦ (707) 462-5021 ✦ (fax) 462-0318
www.ecmconline.com ✦ ecmc@pacific.net

Mailed Letter GM-4

Response to Comment 1
The Board's direction for the Administrative Draft Final Forest Management Plan (ADFFMP) is for an average annual allowable cut of 20-25 million board feet (MMBF), not to exceed 35 MMBF. The Management Plan is designed to provide a wide range of forest conditions over space and time, thus providing opportunities for a wide range of research. Board policy requires that management plans be reviewed at least every five years to determine of any changes are needed. This periodic review process will allow the Board and department to make adjustments to plan direction over time if a need for change is identified.

Response to Comment 2
The Board is committed to ongoing interaction with the scientific community regarding management at JDSF and other forestry research issues. The Board is currently working to re-establish its long-dormant Committee on Research.

Response to Comment 3
The opposition to a local advisory entity is noted. The Board has provided direction to the department for the establishment of a JDSF advisory body "to include persons with knowledge of forest resource issues; be drawn from a variety of interests, including local and beyond, environmental, timber management, and recreational; have expertise in relevant scientific disciplines, e.g., forestry, botany, ecology, fish biology. The charter will specify the number of members. Members do not 'represent' particular interests – they are chosen for knowledge and are to represent the public interest." The advisory committee is to be just that, advisory. Decision making will remain in the hands of professionals.

Response to Comment 4
The proposed management plan is designed to provide a significant amount of flexibility in the management of JDSF. On reason for this flexibility is to ensure that a wide range of research and demonstration opportunities are available. While the advisory group will provide important input on forest management, on-the-ground management decisions will be made by professionals.

Response to Comment 5
The Board shares the commenter's interest in getting JDSF back in full operation as soon as possible. The new management plan provides an excellent framework for the management scenario described.

Response to Comment 6
The Board agrees that JDSF could do a better job in education and public outreach, and that it has "a wonderful story to tell." The Board will continue to work with the department to help strengthen the Forest's education and outreach programs and to help the Forest get the resources needed to do so. The Board is very interested in the potential education and outreach opportunities offered by the proposed Noyo Center for Science and Education.

Response to Comment 7
The support for Alternative G is noted. This is the management direction provided in the ADFFMP.

GM5

To: CDF, P.O. Box 944246, Sacramento, CA 94244-2460.
From: Mary Pjerrou, Greenwood Earth Alliance, P.O. Box 106, Elk, CA 95432
Date: June 17, 2007

1 The Jackson State Forest Plan includes so-called "even-age" management (clear-cutting) in as much as 40% of the forest, some of it for "research" purposes. Why is this research needed? The experiment of clear-cutting our forests has already been undertaken on a massive scale, by Georgia Pacific, Louisiana Pacific, Hawthorn Timber, Mendocino Redwood Company, and their predecessors, and the "scientific" results are well-established: massive erosion and sedimentation of rivers and streams; the near extirpation of the coho salmon and decline of the steelhead trout, with ruinous economic and ecological impacts; the near extirpation of the marbled murrelet and grave decline of the northern spotted owl; the massive loss of endangered species habitat;, the loss of 80% of timber volume on corporate-owned timber lands (a fifth of the county) in only 30 years time; devastating impacts of the pesticides used with clear-cutting on amphibians and other species; massive timber job loss and the closure of the coastal logging mills; and, finally, a worldwide crisis of deforestation, of which this corporate "experiment" conducted in Mendocino is but one tragic part--and a major cause of global warming, due to the loss of forests as the cleansers of our planet's fragile and highly impacted atmosphere.

2 What more "research" do you need? The verdict is in. Clear-cutting of ancient forests is a disaster of earth-killing proportions. It is unconscionable, whether for profit, or for this new scam called "research," whether on large areas, or in small, deceptive guises. We need every remnant of ancient forest and recovering logged forest to be preserved, other than minor management for stand health. We need every bit of green. We have none to spare. None!

3 This loophole through which many corporate logging trucks can be driven should be removed from the Jackson State Forest Plan. It hauntingly resembles the loophole of "scientific research" that is being used by Japan and Norway to slaughter some of the last whales in our dying oceans.

4 This state forest plan does not exist in vacuum. It exists in an immediate context of ravaged forest lands throughout the county, and throughout northern California, and in a larger context of similar impacts of industrial logging around the globe. Jackson State Forest contains rare and precious wildlife and fish habitat almost [illegible] loss of such habitat on tens of thousands of nearby acres. It also contains a critically important mass of greenery, essential to the survival of our planet. Corporate loggers have proven themselves to be irresponsible and uncontrollable, if given the slightest loophole that permits them to damage the environment in favor of profit. Please remove this and all loopholes that permit clear-cutting of any kind. Please bring this vast and terrible experiment in the impacts of "even-age" management to an end.

5 The World Wildlife Fund gives our planet 50 years, at present levels of pollution and consumption--that is, 50 years to the DEATH of the planet! What does it take to knock sense into peoples' heads? There is no time left for bureaucratic word games, sneaky loopholes and business-as usual. The goal should be to maximize forest volume as quickly as possible, and to maintain that volume, for the sake of all life on earth. No more loopholes!

Mary Pjerrou, Co-Director, GEA

Mary Pjerrou

Mailed Letter GM-5

Response to Comment 1
The commenter's estimate of area devoted to the use of future clearcutting is grossly overstated. As much as 26 percent of the Forest may be managed on an even-aged basis, and the use of clearcutting will be strictly limited to a small fraction of this amount. Although the practice of clearcutting is and has been wide-spread within the region, most of this cutting has been conducted on private timberlands and has not been studied in detail, nor have results been available for review by agencies, forest managers and the general public. In addition, the methods of forest management have developed steadily over the years in which these stand management practices have been utilized, presenting a dynamic set of conditions to study and evaluate. The scope of forest research has expanded considering wildlife, ecology and watershed subjects. Research results often provide information on the environmental effects of a specific management technique, both positive and negative. Limiting research on specific management techniques will narrow the information available to evaluate them

Significant advancements in road building, road maintenance, and timber yarding practices have occurred since the first stands were clearcut in the late 1800s. As recently as 1972, there was no significant environmental regulation in place for forest management operations. Equating modern forest practices to those of the past is inappropriate. Most of the forms of environmental damage stated by the commenter have little or no relationship to the future use of even-aged management within JDSF. The reader is referred to DEIR Sections VII and VIII for the assessment of potential impacts to the environment. Potential impacts to watershed resources, fish, wildlife, the economy, and global warming have been thoroughly considered.

Response to Comment 2
The management plan does not propose to clearcut ancient forest. The commenter does not explain or describe the reasoning for the statement; "We need every remnant of ancient forest and recovering logged forest to be preserved.....". The Board will not speculate as to the nature of the comment being made.

Response to Comment 3
Please see response to comment 1. The use of even-aged management does not produce a loophole. It is intended to create as an opportunity for research and demonstration, and to contribute to sustainable production and valuable habitat.

Response to Comment 4
Please see response to comment 1. The DEIR provides a detailed description of the environmental setting and of the assessment area.

Response to Comment 5
Please see DEIR Section VII.16 for the assessment of carbon sequestration and greenhouse gasses. JDSF is expected to provide a net benefit to world climate and environmental health by sequestering carbon and producing wood products, which has potential to reduce the consumption of oil, coal, and gas associated with the use of other building products, such as steel, cement, and aluminum

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JUN 20 2007
BOARD OF FORESTRY
AND FIRE PROTECTION

GM7

June 22, 2007

Dear Board of Forestry,

My family and I appreciate that you have taken the time to restructure your management plan for Jackson Forest. The improved priority for research, restoration, ecology and public recreation make EIS Alternative 6 much more attractive. However,
1 the allowance for clear cutting is anathema to all these improvements. We live in a
2 time of alarming rates of forest diminishment all over the world. Please do all that you can to save every little bit that remains. Consider also that forests are one of
3 the few truly effective carbon absorbers (and free!). With global warming still on the rise, we should ~~cannot~~ underestimate the value of our living forests. Thank you for your diligent consideration
4 in this matter - the decisions and actions of today will have a significant impact on our future

Dorothea Bowman-Schmidt

Mailed Letter GM-7

Response to Comment 1
See General Response 10.

Response to Comment 2
See General Response 2 and 15.

Response to Comment 3
Refer to EC-42, Response to Comment 2 and E-116 (2005 DEIR) response.

Response to Comment 4
See General Response 15.

RECEIVED BY
JUN 21 2007
BOARD OF FORESTRY
AND FIRE PROTECTION

GM 9

Brian Wilson
707 / 545-5798
P.O. Box 14970, Santa Rosa, CA 95402

June 17, 2007

Members Board of Forestry
PO Box 944246
Sacramento, CA 94244

Re: Jackson State Forest Alternative G

Dear Members Board of Forestry,

FL 9

I support Alternative G's emphasis on research, forest restoration and ecological health, and recreation and public enjoyment; however, I strongly oppose giving the forest managers an open-ended license to clearcut for unspecified "future research possibilities."

I cannot support Alternative G in its present form: any clearcut or similar destructive harvest needs to have an explicit research justification and be limited to the minimum area required for scientific validity.

All proposed interim timber harvests need to be reviewed by the Jackson Advisory Committee to assure they are designed and chosen so as to keep open planning options for restoration and habitat to the maximum extent feasible.

1 Jackson State Forest is not a State Park – it was designated for forestry research and education; thus, recreational concerns need not be addressed. We need more research on restoring forests, not on destroying them.

Please make the requested changes in Alternative G.

Very truly yours,

Mailed Letter GM-9

See Response to Comment Form Letter 9

Response to Comment 1
Desire to eliminate consideration of recreation resources in the management direction of JDSF noted. While recreation will not be the primary focus of the management plan, the Board contends that recreation is a compatible use of the forest.

GM 12

Board of Forestry & Fire Protection.

STOP Clearcutting!

1 What is wrong with sustainable forestry without trashing the forest with clear cuts?

There is a long history of excellent examples using selective methods of harvesting. Nothing new will be learned from clearcutting & you know it!

2 This is not what the citizens of the county or state want! The same folks that supported DDT, overfishing & coal plants want clearcuts. The overwhelming majority of people don't! Good environmental decisions are good for business & the community.

Supplemental EIR for Jackson State Forest

RECEIVED BY
JUN 25 2007
BOARD OF FORESTRY
AND FIRE PROTECTION

Sincerely.

Marvin Trotter MD.
PO Box 1467
Ukiah, Calif 95482

Mailed Letter GM-12

Response to Comment 1
See General Response 10.

Response to Comment 2
The Board will not speculate on what the majority citizen's want. The Board and CDF are responsible for developing a management plan for JDSF that is consistent with existing legislation and supports the research and demonstration mandate of the state forest system. Timber harvesting, including the allocation of various silvicultural prescriptions, under the ADFFMP is based on providing a varied landscape with a set of forest structures designed to support a diverse research and demonstration program. See also General Response 2 and 15.

GM 13

Sierra Club Lake Group
PO Box 1011 Kelseyville, CA 95451

RECEIVED BY
JUN 25 2007
BOARD OF FORESTRY
AND FIRE PROTECTION

June 21, 2007

Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

RE: Jackson State Forest Supplemental EIR

FL 9

Although Jackson State Forest lies a little way outside the Lake Group's boundaries, the welfare of this important neighboring public resource has been of concern to us for a number of years, and we are delighted to have this opportunity to congratulate the Board for its recently declared determination to manage the Forest for broad and varied values, which include wildlife habitat, public enjoyment, and scientific opportunities as well as timber production. We also applaud the designation, in Alternative G, of an interim management period during which a new public advisory committee is designated to work with professional foresters to develop a long-range management plan that incorporates all these complex goals.

On the other hand, we cannot support Alternative G's open-ended license for extensive clearcutting in the guise of unspecified "future research possibilities." An explicit research justification should *precede* any destructive harvest such as clearcutting, and the extent of such harvests should not exceed the minimum area required for scientific validity, as recommended by the Mendocino County working group. During the interim planning period, all proposed timber harvests should be reviewed by the Jackson Advisory Committee, which will provide a guarantee that they are chosen and implemented in a way that maximizes options for future forest restoration, and its present and future ecological health and recreational possibilities.

This long controversy is nearly at an end. By making these changes in Alternative G as we request, you will bring it to a truly triumphant conclusion.

Yours sincerely,

Victoria Brandon Form Letter

Victoria Brandon
Chair, Sierra Club Lake Group

Mailed Letter GM-13

Response to Comment
See Response to Comment Form Letter 9.

GM 16

Marilou Brewer, N.D.
Post Office Box 523
Mendocino, CA 95460-0523
17680 Redwood Springs Drive
Fort Bragg, CA 95437
(707) 964-9514 mlbrewer@mcn.org

RECEIVED BY
JUN 25 2007
BOARD OF FORESTRY
AND FIRE PROTECTION

June 19, 2007

Members Board of Forestry
Post Office Box 944246
Sacramento, California 94244-2460

Re: Jackson State Forest Alternative G

Dear Members Board of Forestry,

Congratulations to the Board on its actions to ensure that Jackson State Forest is managed for the broad public interest. Alternative G's emphasis on research, forest restoration and ecological health, and recreation and public enjoyment is especially important in this day of environmental degradation.

However, I adamantly oppose giving the forest managers an open-ended license to clearcut thousands of acres each decade to provide for unspecified "future research possibilities." We need more research on restoring forests, not on destroying them.

FL 9 I cannot support Alternative G in its present form. Any clearcut or similar destructive harvest needs to have an explicit research justification and be limited to the minimum area required for scientific validity, as recommended by the Mendocino County working group.

Thank you for allowing the interim period in Alternative G during which forest managers will work with a new public advisory committee to develop a long-range landscape and management plan.

To ensure success of the interim planning effort, all proposed interim timber harvests need to be reviewed by the Jackson Advisory Committee. This review is needed to assure that interim harvests are designed and chosen so as to keep open planning options for restoration, habitat, and recreation to the maximum extent feasible.

1 Every day I walk in Jackson State Forest with my dog. It is amazing the damage done by selective logging. Clearcutting would be abysmally damaging to all the plants and animals. Please do not make our Coastal Range look like Oregon with all its clearcuts. Those clearcuts are so obviously ugly, sad and thoughtless. It will take hundreds and hundreds of years for them to grow back. Please do not allow that to be done to California. Once the decision is made to clearcut there is no going back. Please do not allow clearcutting in Jackson State Forest.

FL We are close to ending the long controversy that has kept our public forest shut down for eight years. Please make the requested changes in Alternative G. You will have my thanks and support for moving us forward.

Sincerely,

Marilou Brewer

Marilou Brewer,N.D.
17680 Redwood Springs Dr.
Ft. Bragg, California 95437

Mailed Letter GM-16

See Response to Comment Form Letter 9

Response to Comment 1
The California Forest Practice Rules do not allow clearcutting on the scale that is utilized in Oregon. Large scale clearcutting on JDSF is not proposed (see General Response 10). Many of the current stands at JDSF are the result of large scale clearcutting prior to the designation of this land as a state demonstration forest and the implementation of the Forest Practice Rules.

The commenter does not provide specific information relating to the concern that logging will cause "damage" to resource values other than to aesthetic resources. A detailed discussion of Aesthetic Resources, including impacts, thresholds of significance, and mitigation measures can be found in section VII.2 and VIII.9 of the DEIR. Additional analysis of aesthetics, as related to recreation, can be found in DEIR section VII.14. Further analysis of potential impacts to aesthetic resources relating to Alternative G and the ADFFMP can be found in RDEIR section III.2 and III.14.

The Board recognizes that timber operations can lead to negative impacts on the aesthetics of an area, however determining specific "thresholds of significance" is highly personal and subjective (see General Response 6). Many of the potential impacts of logging are temporary and do not result significant impacts to associated resource values. Mitigation measures have been developed to reduce the potential aesthetic impacts of timber operations to less than significant. This includes implementation of restrictions on the use of even-aged silvicultural practices and timber operations adjacent to special concern areas. Current trends in forest management place greater emphasis on developing practices that provide increased protection to the non-timber resource values including, but not limited to, aquatic and wildlife habitat, aesthetics, and recreation. The management plan will provide for protection of aesthetic values, especially in areas of high public use, such as highway corridors, high-use recreational areas, and near rural residential neighborhoods. The management plan represents state of the art management practices and implementation of the plan is not expected to produce significant adverse environmental impacts (See General Response 2, 11, 12, and 14).

GM-17

California Native Plant Society

Dorothy King Young Chapter – P.O. Box 985 – Point Arena, CA 95468

June 7, 2007

George Gentry, Executive Officer
California State Board of Forestry | Fax: 916-653-0989

Ruben Grijalva, Director
California Department of Forestry | Fax: 916-653-4171

Re: Alternative G, Draft JDSF Management Plan

Dear Mr. Gentry and Mr. Grijalva:

1 CNPS is very pleased that the Department of Forestry created a working group to make recommendations for a new management plan for the Jackson Demonstration State Forest (JDSF). The positive changes that came out of the working group sessions include:

- Focus on research, restoration, habitat, education, and recreation as primary values of the forest
- Establishment of an outside advisory committee to work with CDF on a long-range landscape plan and a revised short-term management plan
- Restriction of harvesting during the interim period when the new plans are being developed
- Recycling of timber profits from Jackson back into JDSF, and secondarily to other state forests.

CNPS still has the following concerns with Alternative G:

Research and Demonstration
Appendix 1 – Detailed Goals and Objectives for Alternative G

Goal #1 – Research and Demonstration

2 Demonstration should specify the demonstration of conservation, restoration and timber production techniques that have not been previously demonstrated. The emphasis should be on new, innovative approaches.

3 Rather than establish only a Forest Education Center, CDF should establish a research institution, in partnership with various academic and scientific entities.

4 Strengthen the language about consulting and cooperating with other organizations to emphasize establishment of long-term research partnerships and geared toward meaningful scientific results.

5 Parameters for research should be specified, including peer review and other standard features for scientific research projects.

Protection for Rare Plant Communities and Rare Plants
Part III – Resource Specific Analysis

6 Impact 1 should be changed to "The project has the potential to reduce the amount of a rare plant community." Rare plant communities, as identified by the California Department of Fish and Game (DFG) that occur or have the potential to occur within JDSF should be specified in the plan.

7 The plan should allow for the fact that DFG's Vegetation Program is still in the process of identifying and describing California's rare plant communities. The plan should specify that timber harvests and other projects within JDSF will be adjusted as new information becomes available from DFG.

8 Impact 4: The project has the potential threaten to restrict the range of an endangered, rare or threatened species. This language should be broadened to include impacts to DFG species of concern. It should be more specific on control of invasive plant species should be included, especially in light of JDSF's poor track record in controlling weeds. Even when herbicides were widely allowed, weeds were rampant.

(9) The document should also reflect the fact that exotic, invasive plants cause problems beyond impacts to rare species. They can increase fire danger, degrade habitat quality and riparian corridors and interfere with visitors' recreational experiences. The plan needs specific measures for reducing the threats from invasive species in those situations.

Impact 6: Cumulative effects resulting in a reduction in the range of a species …

(10) JDSF really needs a baseline biological survey, to be completed before implementation of the new plan. Additional botanical surveys should be rather than species-targeted surveys. These surveys must include field survey forms turned in to DFG, and voucher collection for all rare or special plant taxa. The surveys should follow the CNPS Botanical Survey Guidelines or at least the DFG Guidelines.

(11) Further, the plan should specify qualifications for those conducting any biological surveys: Experience, knowledge of local species and ecology, participation in a CNPS/DFG-sponsored survey workshop.

(12) In general, CNPS would like to see provisions for protection and restoration of Mendocino Pygmy Cypress Forest, much of which exists on JDSF in degraded condition. Consultation with local experts will help identify restoration techniques that are cost-effective, yet control erosion, reduce soil disturbance and minimize hydrological disruption.

Silvicultural Methods

(13) Alternative G allows 26% of the forest for clearcutting and other even-age silvicultural methods. Another 15% is to be "managed" with group selection, which allows clearcuts of up to 2 ½ acres.

(14) Note that these percentages and silvicultural methods differ radically from the recommendations of the JDSF working group.

(15) The working group's recommendation was to incorporate clearcutting and other even-age techniques into "well-justified research projects and as necessary to promote stand health. The size and scope of these projects should be no larger than the minimum needed for scientific validity."

(16) CNPS asks that even-age techniques be used on a case-by-case basis, and only for clearly defined research projects that:

- Fall within the redefined mission of JDSF
- Are properly structured, science-based research projects
- Put limits on the size of the areas to which even-aged techniques will be applied
- Are designed to include peer review and public disclosure

(17) Alternative G currently allows even-age techniques to be applied without being part of scientifically valid, mission-oriented research projects. CNPS finds it unacceptable that clearcutting techniques are justified in terms of "possible future research opportunities."

(18) The plan needs language that establishes scientifically appropriate parameters for research projects, which would help ensure that JDSF is being responsive to its newly defined mission.

Improvements will result in a plan for JDSF that will meet the needs of its varied stakeholders.

Sincerely,

Lori Hubbart

Lori Hubbart, Chapter President
CNPS – Dorothy King Young Chapter

Mailed Letter GM-17

Response to Comment 1
The Board notes the four items identified as positive and concerns with Alternative G.

Response to Comment 2
The comment states demonstrations should be limited to techniques that have not been previously demonstrated. Research at JDSF should not be limited to new management techniques, but should include new topics for investigation. For example topics such as floristic changes or nutrient cycling have not been fully explored. Research results often provide information on the environmental effects of a specific management technique, both positive and negative. Limiting research on specific management techniques will narrow the information available to evaluate them.

Plant communities can vary with the area's history, as well as abiotic factors such as slope or fog intrusion. Fortunately, JDSF provides a gradient of redwood sites from moderate to dry conditions. Research or demonstration results in one area may not be representative of the range of redwood forests. When appropriate, duplicating treatments across the range of conditions at JDSF will provide more useful results across of the redwood region.

Response to Comment 3
The exact nature of future education and research centers would depend on the interest of potential partners as well as local interest. For Goal #1, Alternative G, an objective is to: "Make the State Forest available to educational intuitions and other agencies for conducting research and demonstration projects." CAL FIRE will pursue various partnerships as part of that effort.

Response to Comment 4
Consultation and cooperation with other organizations will be a logical result of the emphasis on research and demonstration. Within Alternative G, Goal #3 includes a new objective is to "Work with partners to conduct research and demonstrations on the effectiveness of measures to protect watershed and ecological processes from potential management impacts." In addition, goal two contains objectives that include cooperation and working with a range of partners including; agencies, private conservation organizations, neighboring landowners including State Parks and the Conservation Fund.

The plans language regarding potential partnerships is sufficient. Given partnerships require the interest of organizations or intuitions outside of CAL FIRE, these entities are not directed by a CAL FIRE Management Plan. The Goals and objectives in the ADFFMP will result in greater outreach and partnerships.

Response to Comment 5
Specific parameters to limit research to peer review quality could become a barrier to science, education and management. Peer reviewed journal studies will continue to be an integral product of JDSF research. This year, two forestry related articles appeared in peer reviewed journals and the Redwood Symposium proceedings was published (31% of the research was associated with JDSF). JDSF has been the setting for many theses and dissertations conducted on subjects ranging from geology to forest ecology. JDSF serves an important role in providing a study site for university graduate students who typically complete their studies in two to five years. As detailed in the ADFFMP Chapter 4, the state forest system publishes a range of publications including state forest newsletter and notes. The latter can provide demonstrations and feasibility evaluations for new techniques. The range in types of research, education and demonstrations are one of the strengths of the state forest system. High quality research with appropriate replicates and controls will continue to be an integral component of the research and demonstration at JDSF.

Response to Comment 6
The comment letter is asking for changing the text in one of the Impact Statements for Determinations of Significance that has been present in various drafts of the EIR since 2002. This concern was not

identified in previous CNPS comment letters to those documents. The suggested phrasing changing "plant community" to "rare plant community" would have little effect as the analysis focuses on the rare plant communities (DEIR VIII.6.2.-25& 26) as a consequence of their status. Given the analysis would be the same, this change is not warranted.

The second part of the comment would change "threaten to eliminate a plant community" with "potential to reduce the amount of". This would establish a threshold that <u>any</u> loss of a rare plant community would be significant. Identifying a resource as "rare" typically highlights the need for careful analysis and mitigations; it does not require absolute prohibitions. The effects to a rare plant community are best addressed in the site specific CEQA document. For example site specific analysis may find that relocating a watershed damaging road may require some removal of rare plant community. The site specific project review would include evaluation of the impacts and creation mitigations as needed. The second change in the text of the Impact Statement would cloud the CEQA process without any insurance of improving conditions.

The DEIR recognizes the importance of protecting rare plant communities. The Management Plan, Chapter III, states that; "JDSF will maintain the current distribution and species of the plant community (pygmy forest) and protect it from harmful human disturbance…"

The REIR, III-38, finds that Alternative G would not result in a significant impact to plant communities, including rare plants in the discussion.

Response to Comment 7
New information is a constant in natural resource planning. If new information on rare plant communities becomes available it would be utilized in subsequent site specific analysis and could be incorporated in forest plan amendments if appropriate. Given the CEQA and THP requirements to use current information, the changes suggested by the commenter do not appear to be necessary.

Response to Comment 8
The comment letter asks for an addition to Impact Sentence 4 referencing one of multiple lists considered in identifying plants considered to be "rare". Alternative G builds on the analysis completed in the DEIR. The DEIR (V6.2-13 &16) describes the lists utilized to formulate the list of Plants of Special Concern. This list included the DFG Species of Special Concern which were queried using Rare Find. The CNDDB (DFG) status will be included in the list presented in the finalIized Forest Management Plan and in ongoing updates. The term "rare" is used generically in the impact statement for clarity and brevity. The addition of text is not necessary, nor would it enhance analysis.

The REIR III-39 lists three aspects of possible significant impacts to rare plants including; potential to reduce the numbers, potential for substantial adverse effects, and potential to restrict the range. Alternative G would not result in a significant impact to rare plants as described in the impact statements.

Response to Comment 9
Alternative G provides additional recognition of the importance of controlling invasive weeds in Goal #2's objective to "Restore conifer forest where early successional hardwoods or invasive plants have become established …." The alternative includes new limits to herbicide use as a result of public input. The public concern regarding specific treatment methods often results in limiting the control of invasive weeds. The plan will include specific direction intended to build trust and move the work on controlling invasive weeds forward.

> In an operational context, herbicides will be used only when no other effective and feasible control methods are found after consideration of the scope of the problem, opportunities to effectively manage the situation, and available alternatives and their potential effectiveness, costs, and risks. JDSF staff will seek opportunities to reduce risk by

> selecting appropriate herbicide formulations and application techniques, as well as taking additional precautions.

The DEIR and Draft management plan lists some potential control measures (DFMP page 65&66). Effective invasive weed management must be ecologically based reflecting the site conditions, environmental concerns, and species present. The best treatments appropriate for the range of conditions at JDSF are not fully established. The most long term effective program would be site specific, build on monitoring and adaptive management, not be limited to specific list.

Response to Comment 10

The concept of a full biological survey of the entire forest is a simple but problematic idea. Surveying almost 50,000 acres effectively for rare plants would require contracting for surveyors beyond JDSF staff or even knowledgeable local botanists. Rare plant information is dynamic, so the surveys would only have value for a limited period of time. Extending this effort to full biological surveys, including the multiple protocols for various species, would make the undertaking more complex. When examined, this concept of a full survey to a complex and dynamic forest would result in information of limited value with a sizable expenditure of funds.

The Board and CAL FIRE recognize the need to improve the biological information for JDSF. Alternative G, Goal 6 includes an objective for improving data collection and making baseline information available. Despite budget and staffing challenges JDSF has built information on rare plant occurrences in the last five years and has recently hired a Biologist. JDSF is compiling biological information incrementally while building expertise and understanding.

A full biological survey of the entire forest is not necessary for the Board to complete the CEQA process. Project specific surveys and the assessment of the potential for cumulative impacts insure rare plants will receive protection. The REIR (III-40) Alternative G found there would be not be a significant cumulative effects to plant species. The DEIR contains a more detailed explanation of the analysis.

Regarding the types of survey, the final plan moves the forest beyond species-targeted surveys. Alternative G changes the direction for botanical surveys to state:

> For timber harvest plans and other large projects with the potential for negative effects on rare plants, JDSF shall follow the Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened, and Endangered Plants and Natural Communities (CDFG 2000). On smaller scale projects, the survey effort will be appropriate for the level of CEQA analysis and the risk of impact to rare plants.

CAL FIRE will continue to provide voucher specimens when appropriate. The comment letter provides no basis for the comment that field survey forms should be turned in to DFG, so the Board is unable to address this comment.

Response to Comment 11

The plans commitment to follow DFG guidelines (see 10) would extend to the surveyor qualifications. The CDFG 2000 guidelines include the following requirements for individuals who conduct surveys:

a. Experience conducting floristic field surveys;
b. Knowledge of plant taxonomy and plant community ecology;
c. Familiarity with the plants of the area, including rare, threatened, and endangered species;
d. Familiarity with the appropriate state and federal statutes related to plants and plant collecting; and,
e. Experience with analyzing impacts of development on native plant species and communities.

The surveys on JDSF would be conducted by individuals who have the knowledge of local species and ecology. JDSF staff and consultants have participated in CDFG and CNPS workshops and look forward to the opportunity to do so in the future.

Response to Comment 12
The Board and CAL FIRE recognizes CNPS and others interest and concern for the Pygmy (Cypress) forest. Please refer also to the responses to your February 10, 2006 letter items numbered 12-14, 19, 22-25, 38- 48 for specific concerns.

Response to Comment 13 – 15
Alternative G contains a strict limit on even-age management of 2,700 acres per decade. During the ten year duration of this plan, a maximum of 5.5% of the forest could receive even–aged silvicultural treatments. Selection harvests for uneven-age management vary from fine scale (individual tree removals) up to coarse scale (group openings). Given the radius of a circular 2.5 acre group opening is 186 feet, and that surrounding trees may be that tall, the regulatory designation reflects biotic conditions.

Alternative G includes the following which will additionally direct even-age management and reflect many elements of the working group's recommendations:

> In addition, consistent with the research-driven focus of Alternative G, the extent of the use of even-aged management, at both the project and Forest-wide level, (a) will be tied to the Forest condition it is intended to produce and (b) will be necessary and appropriate to accommodate research investigations either immediately or at a later time. The foregoing constraints do not apply to even-aged management where necessary to address forest health or problematic regeneration conditions. All proposed even-aged management will be presented to the appropriate advisory committee(s) for review and recommendation prior to implementation.

Response to Comment 16
One potential source of confusion regarding research is the understanding of how natural resource-wildland research is conducted. The Caspar Watershed Studies represents a long-term, well-funded study with pre and post-treatment measures, and statistical design with controls. Graduate study and emerging issues often necessitate research be conducted in a much shorter time frame. Meaningful research can be accomplished if a diverse range of stand structures and conditions are present on the forest. For example, floristic changes in even-age stands can be examined by comparing similar sites which received similar treatments at different times. The management plan provides for a diverse range of forest ages and conditions. This will expand opportunities to study the forest at multiple spatial and temporal scales.

The limits on even-age silviculture was addressed in comments 13-15. Sound statistical design often requires replicates or duplicate treatments. The size of the area sampled varies with the attribute measured. Small, immobile and relatively common organisms may be characterized with a few relatively small plots. More mobile organisms such as wildlife or less widely distributed plants would require more extensive areas to be sampled. When studying multiple interactions, the utility of arranging treatments in a landscape context, for example sub-watershed, gains value. Further limits on the amount of even-age silviculture could reduce research quality and quantity.

The EIR has evaluated a range of even and uneven-aged management proposals. The RERI (I-9) describes the finings of the DERI, "as mitigated, would not have the potential to result in significant adverse environmental impacts". It notes the changes from the Alternative G have resulted in a lesser potential for environmental impacts than C1, and in no case would greater impacts occur.

Response to Comment 17

The value of a diverse landscape for research has been described previously. Clearcutting remains permitted by regulation and is used by private timberland owners in the Redwood region and beyond. There is great research and demonstration value in providing for even-age silviculture, with limited clearcuts, along with uneven-age and older forest development treatments at JDSF. This will allow for long term studies in areas that are publicly accessible and logistically simple for to visit, to review and evaluate the range of treatments. With regards to clearcutting the plan limits are:

> Clearcutting is to be conducted only where strictly necessary for purposes of research, demonstration, addressing forest health, or addressing problematic conditions for regeneration; clearcutting for these four purposes is limited to a cumulative maximum of 100 acres (or 0.2 % of Forest area) per decade.

This direction would limit the clearcutting acreage for possible future research utilization. There is the possibility of additional clearcut acreage, but the management plan restricts this as described below.

> Up to an additional 400 acres (or 0.8 % of Forest area) may be clearcut per decade, but only for specific research purposes that cannot be reasonably met through any other method.

Response to Comment 18

The Management Plan has provided for a range of research and demonstration. Some are as simple as first examining the feasibility of new treatments and are documented in Forest Notes and or featured on field trips. This kind of assessment can help define benefits and drawbacks for focused future research. Others research efforts are complex or long term, resulting in peer reviewed journal articles. Demonstrations are important to the public, regulators, and others to further our understanding of forest management and restoration activities. The interaction with both State Forest Research and JDSF-specific advisory bodies will allow for further strengthening of JDSF value for research and demonstration.

GM 18

Mendocino County Farm Bureau

Affiliated with the California Farm Bureau Federation and the American Farm Bureau Federation
Peter S. Johnson, President
Carre J. Brown, Executive Administrator

June 27, 2007

RECEIVED
JUL 02 2007
BOARD OF FORESTRY

Board of Forestry and Fire Protection
PO Box 944246
Sacramento, Ca. 94244-2460
Attention: George Gentry, Executive Director

Re: Alternative G, Jackson Demonstration State Forest Management Plan

Dear Members of the Board,

The Mendocino County Farm Bureau (MCFB) is in the process of reviewing the new Alternative G and would like to submit the following comments.

1 MCFB is very interested in seeing Jackson Demonstration State Forest (JDSF) back under active management. After all the years of no operation we hope that the Board of Forestry gives the staff of the forest the necessary and timely guidance and direction to do all the preparatory work needed for a successful 2008 timber sales program. The moving target needs to stop and the staff needs explicit direction.

2 The MCFB is in favor of a local advisory group which will provide a perspective that is needed in management decisions. This group needs to be balanced with all sides equally represented and needs to give advice only. We feel strongly the management decisions need to stay in the hands of forestry professionals.

3 Our information indicates the JDSF grows about sixty million board feet of timber per year. The proposed harvest level in Alternative G is twenty million board feet per year. The Board of Forestry needs to take a serious look at this imbalance of growth and harvest and the resulting scenario over time to determine its potential impact on future research at JDSF.

4 A well supported education effort of public tours, outreach and research reports for the non-professionals can play an important role in the long term stability and public support of JDSF. Unfortunately we see very little emphasis on this in the new management plan and see this as being an important part of the legislative intent that is being ignored. This

303-C Talmage Rd. • Ukiah, CA 95482-6417 • (707) 462-6664 • Fax: (707) 462-6681 • mendofb@pacific.net

is not a problem that is unique to this management plan it is a situation that has existed for years and is in dire need of support and direction.

5 MCFB is supportive of preserving the remaining old growth trees on the forest, and providing good habitat for species of concern. We are not supportive of any attempts to make these the prime goal of forest management. We support the Fort Bragg City Council with their desire to see JDSF produce high quality forest products from trees in 6 the 100-120 year age classes. We feel this can be done with minimal impact to the public trust resources. Much of the concern over a lack of suitable habit in the vicinity should have been eliminated with the acquisition of Lower Big River and its incorporation into 7 park status.

8 Successful land management is predicated on flexibility, JDSF is no exception. MCFB supports giving staff as much flexibility as possible to manage the forest whether it be silvicultural methods or recreational opportunities.

9 MCFB supports getting JDSF back under management, and feels Alternative G is a reasonable place to start, the idea of returning JDSF to its preeminent place as a leader in forestry research has the total support of MCFB.

Sincerely,

Peter S. Johnson, President
Mendocino County Farm Bureau

2

Mailed Letter GM-18

Response to Comment 1
The Board shares the commenter's interest returning to active management at JDSF, including a 2008 timber sales program. The Board anticipates that necessary actions will be taken in fall 2007 to permit resumption of active management.

Response to Comment 2
The existence and composition of an advisory group does not per se address the potential for environmental impact from management of JDSF. The Administrative Draft Final Forest Management Plan based on Alternative G calls for a JDSF advisory body and establishes number of terms for it, including calling for it to be drawn from a variety of interests. It is not the intent of the Board or the Department that the advisory body will make management decisions, but that it will provide advice and recommendations to the Board and Department. The Board and Department are still completing the details of the development of the advisory body.

Response to Comment 3
The Alternative G annual average harvest level of 20-25 million board feet (MMBF) per year during the first planning period (10 years) does not establish a specific limit on harvesting, but is rather an estimate of how much harvesting is likely to occur, given the goals and constraints of that alternative and the timber stocking level on the Forest. The proposed Administrative Draft Final Forest Management Plan establishes that, given the various management constraints and goals of the Plan, the annual harvest is expected to be in the range of 20-25 MMBF per year and may not exceed 35 MMBF. This goal allows ample harvesting to ensure that JDSF's primary purpose of research and demonstration on forest management will not be thereby constrained.

Response to Comment 4
The Administrative Draft Final Forest Management Plan based on Alternative G places the primary management emphasis on research and demonstration, including for nonprofessionals such as the general public and small forest landowners:

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

Response to Comment 5
The Administrative Draft Final Forest Management Plan based on Alternative G places its primary emphasis on research and demonstration (see response to comment 4). The plan balances forest management and species/habitat protection concerns, as directed by Public Resources Code § 4639:

> "Management" means the handling of forest crop and forest soil so as to achieve maximum sustained production of high quality forest products while giving consideration to values relating to recreation, watershed, wildlife, range and forage, fisheries, and aesthetic enjoyment.

Response to Comment 6
The Board anticipates that the management approach provided in Alternative G and in the proposed Administrative Draft Final Forest Management Plan, including provisions for managing over one-third of the Forest for older forest conditions, will result in increasing yields of mature timber being harvested over time on a sustainable basis.

Response to Comment 7
Alternative G and the Administrative Draft Final Forest Management Plan based on it contains a number of measures to provide suitable habitat, as enumerated in the DEIR (see section VII.6.6, Wildlife and Wildlife Habitat) and RDEIR (see section III.6.6, Wildlife and Wildlife Habitat). The role of the acquisition of the Big River Unit of Mendocino Headlands State Park in providing habitat over time was recognized in the DEIR. It also bears noting that the Conservation Foundation recently acquired 11,400 acres of the lower Big River watershed. The Conservation Foundation has indicated that it will manage this area similarly to its Garcia River tract, which is managed for a return to ecological and economic viability.

Response to Comment 8
The Board recognizes that CAL FIRE and JDSF managers must have flexibility to manage the Forest. The alternatives addressed in the DEIR and ADEIR are programmatic, not project-oriented, as is the Administrative Draft Final Forest Management Plan based on Alternative G. Hence, the management direction considered for JDSF has provided for substantial flexibility.

Response to Comment 9
The Board's Administrative Draft Final Forest Management Plan for JDSF is based on Alternative G. The Board strongly supports the creation of a world class forestry research program at JDSF.

7.10.07
GM-20

Mr. George Gentry
Executive Director
State Board of Forestry and Fire Protection

Gentlemen:

1 As a member of a coastal group of bicyclist, and as part of a coastal community that uses Jackson state forest for recreation, I urge the Department of Forestry to recognize and keep open our forest roads and trails. These named and unnamed trails are continuously used by hikers, walkers, joggers, birders, mushroom pickers, bicyclists, equestrians and pick nickers. We all value these trails greatly and consider them a very important part of our neighborhood. These roads give us access to great vistas, wonderful forest sanctuaries and hours of enjoyment.

The East Casper section of road 500 which travels some 8 miles south-easterly to connect to Little Lake Road 408 is the access point to roads 508,510,511,512, 513, 600 and consequently to roads 450 and 400 and the popular parallel paths along and around road 500. All of these roads see year round use.

Road 600, which drops into the Caspar Creek watershed with its beautiful stand of old growth redwoods, leads to roads 630 and 640 which both allow riders to climb up to toad 408 again and then south on 408 to the area called the Mendocino Woodlands.
The Woodlands is a network of hiking and biking paths; The Manley Canyon trail, the Forest History Trail, The Observatory trail all lead into the campground area and road 730. This area is heavily wooded and steep. We have worked routinely to keep the paths clear of fallen trees and
2 have installed many water bars and a few foot bridges. We are interested in working with C.D.F. in maintaining the integrity of these trails and keeping them open and not eroded. As a club we spent one day last summer rebuilding and redirecting the Camp -One Loop, at Camp-One.

The area around Camp One and the Egg-taking station and the day use activities of these area trails are also very important to the public. The camping areas are surrounded by roads and trails, from the Equestrian trail to the Camp-One Loop to roads 360,361,380,381,330,300 and up to Road 1000. Road 300 is an easy route form Fort Bragg to the Egg-taking station and road 330 will allow you to travel from the Egg-Taking station on to road 200 and the Chamberlain Creek day use area. Riding along road 330 will takes you past ancient redwoods and turn of the century
1 railroad trestles, past Indian Springs, and along hillside meadows. One can easily ride safely from
Cont. Chamberlain Creek to Fort Bragg in an afternoons time.

The Chamberlain Creek area and its primary road 200 harbor many unnamed trails [Pepe-le-pew] and roads 240 and 250 gives access to many bike and equestrian trails. Also south of Hwy 20 lie roads 800 and 810 which will take one to the very limit of Jackson State Forest., and on to Two Rock and it's nest of falcons at 2700 feet.

3 All of these areas are much used on warm weekends and we encourage more. To have a 50,000 acre State Forest in our community with its dedicated public use is an advantage to our

3 community that few other communities have. I believe that having access to these trails and keeping them maintained is a necessary part of our extending invitations to neighboring communities to visit and use our State Forest. If tourism is to be realized by our community then Jackson State Forest can play a leading role in helping to achieve that and we, as the Mendocino Coast Cyclists, would like to assist C.D.F. in that purpose.

Sincerely yours

Stan Miklose

Mendocino Coast Cyclists

Mailed Letter GM-20

Response to Comment 1
The Board concurs that the management of the Forest should include a continued and expanded program for recreational trail development and maintenance. This is an element of the ADFFMP that the Board has approved.

It is likely that the trail system will be expanded, but also possible that some road or trail segments that represent a threat to watershed resources may be eliminated or bypassed in order to prevent significant impacts. This may have a minor and insignificant effect upon the overall availability of recreational trails.

The Board notes that most of the individual roads identified by number are open for recreational use, though one or two have been decommissioned and no longer have a running surface suitable for motorized vehicles and perhaps bicycles. Currently, all roads and trails open for foot traffic may also be utilized by cyclists and equestrians. No motor vehicles are allowed on trails, and unlicensed motor vehicles are not allowed within JDSF.

Response to Comment 2
The Board and Department support the idea of joint trail planning and maintenance. The Department will begin a process of meeting and consultation with local recreational user groups, including cyclists.

Response to Comment 3
The Board also supports an increase in recreational opportunities within the Forest.

GM-21

Marc Komer
17400 Shafer Ranch Rd.
Willits, CA 95490

Board of Forestry and Fire Protection
~~P.O. Box 944246~~
Sacramento, CA 94244-2460

Re: Limit clearcuts in Jackson State Forest

July 4, 2007

I congratulate the Board on its actions to ensure that Jackson State Forest is managed for the broad public interest. I support Alternative G's emphasis on research, forest restoration and ecological health, and recreation and public enjoyment.

However, I strongly oppose giving the forest managers an open-ended license to clearcut thousands of acres each decade to provide for unspecified "future research possibilities." We need more research on restoring forests, not on destroying them. Twenty-one million board feet per year of lumber production is unacceptable.

FL9 I cannot support Alternative G in its present form. Any clearcut or similar destructive harvest needs to have an explicit research justification and be limited to the minimum area required for scientific validity, as recommended by the Mendocino County working group. I urge you to incorporate the recommendations of the working group into Alternative G.

I applaud the interim period in Alternative G during which forest managers will work with a new public advisory committee to develop a long-range landscape and management plan.

To ensure success of the interim planning effort, all proposed interim timber harvests need to be reviewed by the Jackson Advisory Committee. This review is needed to assure that interim harvests are designed and chosen so as to keep open planning options for restoration, habitat, and recreation to the maximum extent feasible.

1 Mendocino County Supervisors Pinches and Delbar publicly expressed disapproval of Measure G because of the proposed reduction of historic quantities of logging in Jackson Forest. I believe these supervisors do not represent current reality. In the past, Jackson Forest produced large numbers of logs because it was not sustainably logged, and is now depleted.

Now is the time to manage the forest for restoration, and perhaps in the future it can be re-harvested for production. In the meantime, the forest's best use is for research, recreation, demonstration and preservation.

Sincerely,

Marc Komer

Mailed Letter GM-21

An identical letter was received from Robin Goldner (GMF-5). The following serves to respond to both letters.

See Response to Comment Form Letter 9

Response to Comment 1
At the time of purchase JDSF was in a largely cut over condition with relatively low stocking. By practicing sustainable forestry and harvesting less than growth, the current standing inventory exceeds 40,000 board feet per acre. The comment that JDSF "is now depleted" is not supported. The estimated harvest level under the ADFFMP is 20 to 25 million board feet annually with a long term sustained yield (LTSY) of 56 million board feet annually (see RDEIR Table III.7).

GM-22

Dr. David Schneider
OPTOMETRIST
(510) 848-6733 • ds6956@earthlink.net
1736 HEARST AVENUE • BERKELEY, CA 94703

Dixon
GM-22
RE:
SUPPLEMENTAL EIR
For JACKSON
STATE FOREST

DEAR THE BOARD —

I support ALT. G.

1 However, I oppose giving the Forest Managers a Jackson State Forest an open-ended license to clear 1,000's acres / decade to provide for unspecified possibilities. Any clearcut harvest needs to have an explicit research justification + scientific validity as recommended by Mendocino City Working Group.

2 All proposed timber cuts need to be reviewed by Jackson Advisory Committee

Thank you —

Sincerely —

Dr. Schneider

Mailed Letter GM-22

Response to Comment 1
See General Response 10.

Response to Comment 2
See General Response 18.

about:blank

GM-23

June 27, 2007

Members Board of Forestry
PO Box 944246
Sacramento, CA 94244-2460

Subject:
Jackson State Forest Alternative G

Dear Members Board of Forestry,

1 I would like to urge you to not allow clear cutting in Jackson Forest at all unless it is done with a very specific plan and purpose that is approved by the advisory committee. When our children were young we spent very happy stays in the forest and loved the unspoiled redwoods that are the last remaining
2 truly large stand. It is the only such large forest left and these ancient trees should not be cut for fast
3 money from their wood. Please conserve this beautiful area as it is for future generations. As our population continues to grow we will need this oasis of wilderness more and more.

4 I have read that areas in cities that have trees are much less subject to crime and violence that areas that do not have trees. It is clearly of benefit for humans to have natural areas for health and sanity. We need to keep this forest as close to how it is as a very precious resource that is truly irreplaceable.

I congratulate the Board on its actions to ensure that Jackson State Forest is managed for the broad public interest. I support Alternative G's emphasis on research, forest restoration and ecological health, and recreation and public enjoyment.

However, I strongly oppose giving the forest managers an open-ended license to clearcut thousands of
FL acres each decade to provide for unspecified "future research possibilities." We need more research on
9 restoring forests, not on destroying them.

I cannot support Alternative G in its present form. Any clearcut or similar destructive harvest needs to have an explicit research justification and be limited to the minimum area required for scientific validity, as recommended by the Mendocino County working group.

I applaud the interim period in Alternative G during which forest managers will work with a new public advisory committee to develop a long-range landscape and management plan.

Sincerely,

Ellie Gioumousis
992 Loma Verde Avenue
Palo Alto CA 94303

6/28/2007 4:35

Mailed Letter GM-23

See Response to Comment Form Letter 9

Response to Comment 1
See General Response 10 and 18.

Response to Comment 2
The ADFFMP does not propose cutting ancient trees. See General Response 8.

Response to Comment 3
See General Response 15.

Response to Comment 4
This comment is beyond the scope of the JDSF EIR process. See General Response 2.

1430 Cedar St., Fort Bragg, CA 95437...July 7, 2007

GM-24A

Board of Forestry
P. O. Box 944246
Sacramento, CA 94244

Dear Board members:

It's nearly impossible for the interested layperson to track the phases of EIRs for various public projects. But in response to the June 1, 2007 notice regarding Jackson Demonstration State Forest I will enclose a copy of my original letter of comment dated June 29, 2002.

I will also use this occasion to relate a relevant personal experience: Over the course of many seasons another retired volunteer and I eradicated with hand tools Pampas grass in the dunes secton of McKerricher State Park where we continue to follow up for seedlings. During that period we observed a paid crew attempting to control European dune grass which was said to threaten the snowy plover. European dune grass is a perennial which propagates via rhizones which draw moisture deep in the sand. Responding to opposition to the use of herbicides by a small group of vocal environmentalists only hand tools were employed. The last time I encountered the crew two years ago they said they were futilely digging the same areas for the 13th time. More recently I heard that during a local public meeting the park service belatedly announced after hundreds of thousands of dollars of wasted effort that herbicides were going to be employed on the dune grass. At that or at another meeting it was also announced that herbicides would be used on severe infestations of gorse in the Caspar area.

Is there a lesson here for JDSF? There is much evidence that in our so-called "democracy" public officials are reluctant to articulate the trade-offs involved until too late in many social and economic as well as environmental issues when rigid ideological groups may be aroused. This was covered in no-nonsense articles in the Mar-April '97, page 23, and June '03, page 73, Audubon magazine by the respected environmental writer, Ted Williams. As you must know, the California Invasive Plant Council, 1442-A Walnut St. #462, Berkeley, CA 94709, publishes a regular science based journal on the subject.

In haste,

Richard Van Alstyne

Richard Van Alstyne

(over)

1430 Cedar St., Fort Bragg, CA 95437...June 29, 02

GM-24B

Christopher Rowney, CDF
P. O. Box 944246
Sacramento, CA 94244

Dear Mr. Rowney:

In regard to the Jackson Demonstration State Forest EIR, I will confine my comments to the one important aspect of management where I have extensive experience.

I am most concerned with the proposal, if any, for control of so-called invasive exotic species. In my view, this should be given top priority. If you are knowledgeable about this subject you know that the rapid spread of exotics is considered by experts to be second only to human development activity on environmental degradation. An example for action, now belated at best, must be set by resolute public lands managers.

This position is offered without direct reading of the draft EIR but rather from considerable experience of dealing with public officials and voluntary work on public lands. Evidence of my participation is to be found in the enclosed papers.

I do not ask that a copy of the draft EIR be sent to me, but I would appreciate knowing the wording of the section, if any, which deals with exotic species control.

Very truly yours,

Richard Van Alstyne

Mailed Letters GM-24A and -24B

Response to Comments
Both letters focus on the importance of addressing invasive species in the management of JDSF.

The ADFFMP places a high priority on controlling invasive species and provides the flexibility needed for managers to address this issue. This includes the use of herbicides as part of an Integrated Weed Management program (see General Response 7). The Management Plan includes as part of Goal 2 the objective to minimize the influence of invasive exotic plants and animals. Jackson Demonstration State Forest is a partner in the Mendocino Coast Cooperative Weed Management along with State Parks and other concerned groups and agencies.

GM 25

CALIFORNIA LICENSED FORESTERS ASSOCIATION

P.O. Box 1516 Pioneer, CA 95666
phone 209.293.7323 fax 209.293.7544
email clfa@volcano.net web www.clfa.org

July 16, 2007

Mr. George D. Gentry
Executive Officer
Board of Forestry and Fire Protection
PO Box 944246
Sacramento, CA 94244-2460

Reference: Comments on Jackson Demonstration State Forest DEIR Alternative G

Dear Mr. Gentry,

Jackson Demonstration State Forest (JDSF) in Mendocino County is of critical importance to the sustainable practice of forestry in our Golden State. CLFA has reviewed the *Recirculated Draft Environmental Impact Report for the Draft Jackson Demonstration State Forest Management Plan Alternative G (Recirculated Draft).*

In a letter dated January 28th, 2006, we commented on the earlier *Jackson Demonstration State Forest DEIR (DEIR)*, which included Alternatives A through F. We encouraged the Board to select Alternative C1. Our 1/26/06 correspondence made substantive points with regard to JDSF and we believe those points remain fully valid and compelling. The letter is posted on our website at http://www.clfa.org/whats_new.htm, and a copy is also attached. 1

Although we still support Alternative C1, we believe that some features of the new Alternative G deserve favorable consideration, while others do not.

The following analysis of Alternative G is additive to our previous comments. We hope these combined letters will be helpful to the Board as it weighs final decisions and acts to set JDSF on course for a more productive and socially beneficial future. 2

Alternative G, Areas of Conceptual Agreement

CLFA sees merit in portions of Alternative G. These include its emphasis on "Management with a Research-Driven Mission." We also support the concept of an advisory committee focusing its efforts exclusively on JDSF, although we have specific concerns about this which are expressed below. 3

CLFA also supports the establishment of an Older Forest Structure Zone, as proposed. We believe that this provision has potential research benefits and represents a compromise land allocation that may reassure past opponents of JDSF forest management that their voices have been heard in the current planning process. In endorsing this new land allocation, CLFA recognizes that the annual harvest level projected under Alternative C1 will need to be adjusted downward, but we do not see the level declining by greater than 4 MMBF (Million Board Feet). 4

Prescribing Health for California's Forests

Alternative G, Areas of Possible Concern

5 1. **Reversal of Priority Ranking:** CLFA strongly opposes placing "Forest Restoration" above "Timber Management" as goals proposed by Alternative G[1]. We recognize, however, that both terms have value and can be compatible objectives on the ground.

6 **2. Advisory Committee:** While supporting the JDSF Advisory Committee in concept, CLFA requests that the Board exert diligent oversight, including explicitly requiring its consent for all Committee appointments. In addition, we caution against any implicit endorsement for a "home or local rule" concept, as JDSF is a state forest and state-level research and demonstration objectives are paramount.

7 **3. Annual Harvest Level:** Alternative G projects an 11 MMBF harvest reduction when compared to Alternative C-1. The *Recirculated Draft* blandly states, "A reduction in annual harvest is also expected to result in a modest reduction in forest products, jobs, taxes, and revenue."[2] This statement contradicts the *DEIR's* own analysis[3], which estimates that a harvest reduction of 10 MMBF would have direct and indirect impacts to wage earners, local and state government of ***$9.6 million***. Therefore, an 11 MMBF reduction can be expected to forgo ***$10.5 million, every year.*** *Is that a "**modest reduction**"?*

8 JDSF is estimated to be growing 60 MMBF of wood fiber annually[4]. Harvesting only 33% of growth does not strike a responsible balance between JDSF's statutory scheme, its expressed mission and important environmental constraints. The more that sustainable timber harvest is suppressed at JDSF, the smaller the pool of resources that will be available to maintain and restore local and regional infrastructure, staffing, research and numerous other potential public benefits.

9 As previously stated, we accept that the harvest level called for by Alternative C-1 should be modestly adjusted downward. However, we believe this should be nowhere near the 35% harvest decline specified under Alternative G.

10 **4. Interim Harvest Limitations:** Under this provision, the Board is asked to sanction a harvest resumption scheme that postpones any final resolution of the controversy which has crippled JDSF for many years. In fact, given the intractability exhibited in the past by some JDSF opponents, it just may not be "in the cards" that a 100% consensus management approach is possible.

CLFA invites the Board to weigh carefully its direction with regard to this proposal. Management must not be allowed to resume at JDSF only to be disrupted once again in two or three years if the interim arrangement fails to deliver the promised transition.

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[1] See *Recirculated Draft,* Pgs I-3&4.
[2] *Recirculated Draft,* Page II-16.
[3] See Table III.13 Employment and Revenue Effects of Various Timber Harvest Levels, *Draft Environmental Impact Report for the Jackson Demonstration State Forest Management Plan, Volume 1A,* December, 2005, Page III-55. Of particular interest is a comparison of a 20 MMBF with a 30 MMBF harvest level.
[4] Statement of Dr. Helge Eng, CAL FIRE, before the Board on July 11, 2007.

We also note that none of the proposed interim THPs utilize an even-age silvicultural system and that even group selection is excluded during the initial implementation period. Also, trees greater than 30 inches in diameter are given a special
11 status, when in fact young growth redwood trees may attain such dimensions on Site II land in just a few decades. Alternative C-1 with the addition of the Older Forest Structure Zone provides high levels of protection for old growth and late seral values. The ecological benefits, if any, of additional protections based on tree diameter or so-called "older young growth" are outweighed by their economic and social costs.

5. **Carbon Sequestration:** The *Recirculated Draft* estimates that Alternative G will sequester more carbon dioxide than Alternative C1[5]. CLFA is concerned that in the
12 current political climate, this estimate could be given more weight than it deserves. We encourage the Board or other interested parties to analyze the data that went into these estimates, recognizing that the science of estimating forest carbon sequestration is relatively new, unsettled and evolving.

Thank you for the opportunity to provide additional professional perspective on
13 the future of JDSF. CLFA hopes that our contributions are helpful as you deliberate and decide upon an exciting new direction for this unique and extremely valuable public asset.

Sincerely yours,

Chantz Joyce

Chantz Joyce, RPF #2753
President

Cc: Mr. Stan Dixon, Board Chairman and Members.
CLFA Board of Directors.

Enclosure: CLFA JDSF DEIR Comment Letter dated January 28, 2006.

The California Licensed Foresters Association, with a membership responsible for the sustained management of millions of acres of California forestland, represents the common interests of California Registered Professional Foresters. The Association provides opportunities for continuing education and public outreach to its membership, which includes professionals affiliated with government agencies, private timber companies, consultants, the public, and the academic community. Governed by an elected Board of Directors, CLFA was established in 1980 after the passage of the landmark California Professional Foresters Law.

[5] *Recirculated Draft*, Page III-160.

Mailed Letter GM-25

See also Response to Comment Mailed Letter P-6

Response to Comment 1
Please see the separate response to this letter of comment (comment letter P 6) on the 2005 DEIR.

Response to Comment 2
Comment noted.

Response to Comment 3
Comment noted.

Response to Comment 4
The Board agrees that the Older Forest Structure Zone (OFSZ) offers important research benefits at the same time as it offers benefits of protecting existing old-growth groves and restoring an extensive, connected area of older forest conditions.

The RDEIR (Table II.4, p. II-28) estimates that Alternative G would result in an anticipated annual average harvest of 20-25 million board feet (MMBF) per year during the first 10-year planning period. This reduction in estimated harvest, as compared to Alternative C1, is a result of a number of factors, including: creation of the OFSZ, designation of an additional 1,549 acres for late seral forest development to recruit Marbled Murrelet habitat in the Russian Gulch/Lower Big River area of JDSF, limitations on the use of even-aged management. This range represents an estimate that might be subject to change with direct experience in implementation of Alternative G.

The proposed Administrative Draft Final Forest Management Plan (ADFFMP) establishes that, given the various management constraints and goals of the Plan, the annual harvest is expected to be in the range of 20-25 MMBF per year and may not exceed 35 MMBF.

Response to Comment 5
The Board believes that the ADFFMP based on Alternative G provides an appropriate balance between restoration and management activities, as directed in the Public Resources Code, as well as the articulation of the Goals and Objectives for the Plan.

The Public Resources Code (section 4639) provides the following direction on management of the Demonstration State Forests, including JDSF:

> "Management" means the handling of forest crop and forest soil so as to achieve maximum sustained production of high quality forest products while giving consideration to values relating to recreation, watershed, wildlife, range and forage, fisheries, and aesthetic enjoyment.

The first Goal established in Alternative G and the ADFFMP based on it, “Research and Demonstration,” includes “economic forest and timber management” as a key element (see RDEIR Appendix 1). Goal #2, Forest Restoration, recognizes that active management is to be used to achieve the restoration goal and objectives and that forest productivity is to be promoted and enhanced.

The Board has significant discretion in balancing forest management and timber production with “values relating to recreation, watershed, wildlife, range and forage, fisheries, and aesthetic enjoyment.” The Board believes that the ADFFMP provides an appropriate balance between these elements. Based on the analysis contained in the DEIR, RDEIR, and FEIR, the proposed management of JDSF would provide substantial protection of and benefits to recreation, watershed, wildlife, fisheries, aesthetic enjoyment, research, and demonstration, while at the same time including significant levels of timber management and harvest.

Response to Comment 6
The existence and composition of an advisory group is not per se related to the potential for environmental impact from management of JDSF. The ADFFMP provides partial direction for the establishment of a JDSF advisory body. The Board and Department are committed to establishing an advisory group and are currently taking steps to do so. The Board recognizes that the appointment process for the advisory group and its oversight are both very important to the group's success. The Board concurs that the composition of the advisory group must reflect that fact that JDSF is a State forest that must serve state-level research and demonstration needs.

Response to Comment 7
The RDEIR (Table II.4, p. II-28) estimates that Alternative G would result in an anticipated annual average harvest of 20-25 million board feet (MMBF) per year during the first 10-year planning period, or a reduction of 6-11 MMBF/year as compared to Alternative C1. A key purpose of the CEQA process is to compare the differences in potential outcomes of the various alternatives examined. Alternative G's reduction of 6-11 MBF/year from Alternative C1 is modest in comparison to the estimated reduction of 23 MMBF/year under Alternative E.

The proposed Administrative Draft Final Forest Management Plan establishes that, given the various management constraints and goals of the Plan, the annual harvest is expected to be in the range of 20-25 MMBF per year and may not exceed 35 MMBF.

Response to Comment 8
See responses to Comments 4 and 5. As noted above, in the proposed ADFFMP, the annual harvest is expected to be in the range of 20-25 MMBF per year and may not exceed 35 MMBF. This range of potential annual harvest represents a range of 36 to 63% of the anticipated long-term sustained yield of 57 MMBF/year under the proposed Plan.

Response to Comment 9
See responses to comments 4, 5 and 8.

Response to Comment 10
The ADFFMP under consideration by the Board does include the initial implementation period limitations. The Board and Department are committed to ensure that the proposed advisory body and other process elements of the initial implementation period result in a smooth return to active management at JDSF, as well as a smooth transition from the initial implementation period to on-going long-term management.

Response to Comment 11
The ADFFMP allows for evenaged management research projects on the Caspar Creek experimental watershed. Section 2 of the short-term harvest schedule (see Table 9 in the ADFFMP) allows for group selection, provided there is review by appropriate advisory bodies.

Response to Comment 12
Carbon sequestration potential is just one of the many important factors that the Board has considered in providing management plan direction for JDSF. The Board recognizes the great potential for research at JDSF to help further the science and resolve uncertainties regarding forest management and carbon sequestration.

Response to Comment 13
Comment noted.

GM-27

Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

Dear Members of the Board,

FL9 We of the Napa Sierra Group would like to extend our congratulations to the Board on its actions to ensure that Jackson State Forest is managed for the broad public interest. We along with Sierra Club Redwood Chapter and other regional Sierra Club groups support Alternative G's emphasis on research, forest restoration and ecological health, and recreation and public enjoyment.

However, we are in agreement in strongly opposing giving the forest managers an open-ended license to clearcut thousands of acres each decade to provide for unspecified "future research possibilities." We need more research on restoring forests, not on destroying them.

1 The November 2006 report from the Jackson Forest Working Group, is a model of collaboration and consensus recommendations. The JFWG presented a working plan to be implemented in a few phases, which would ensure a healthy and protected forest. Vince Taylor, who was a member of the working group recently wrote and quoted that the working group recommended that clearcutting and other even-age management be limited to, ***"well justified research projects and as necessary to promote stand health. The size and scope of these projects should be no larger than the minimum needed for scientific validity."***

FL9 We therefore cannot support Alternative G as it is currently presented. Any clearcut or similar destructive harvest needs to have an explicit research justification and be limited to the minimum area required for scientific validity, as recommended by the Mendocino County working group.

The introduction of a public advisory committee who will work alongside the forest managers during this interim period of Alternate G is a welcomed aspect in truly developing a long-range landscape and management plan.

To ensure success of the interim planning effort, all proposed interim timber harvests need to be reviewed by the Jackson Advisory Committee. This review is needed to assure that interim harvests are designed and chosen so as to keep open planning options for restoration, habitat, and recreation to the maximum extent feasible.

It appears that after years of conflict over this public forest a mutually agreed process and plan are close to being achieved. In order to continue the fine working relationship that the Mendocino Group started, please make the requested changes to Alternate G. This was one of their key intents. Thank you for your support.

On behalf of Napa Sierra Club.

Marc Pandone
Executive Committee

Mailed Letter GM-27

See Response to Comment Form Letter 9

Response to Comment 1
While the recommendations of the Mendocino working group have been carefully considered by the Board, the management plan is not based solely on their recommendations.

GM-28

Public Comment from: The Old Growth Organization
P. O. Box 4225
Arcata, Ca. 95518

To: Board of Forestry and Fire Protection
P. O. Box 944246
Sacramento, Ca. 94244-2460

Concerning: Jackson State Forest
DEIR of June 1, 2007

Please, file this letter for public comment concerning Jackson State Forest and the DEIR of 6/01/2007.

Dear Sir or Madam:

I am writing you because of my concern about Jackson State Demonstration Forest, (JSDF), and the proposed DEIR of June 1, 2007. Please, consider my opinion, which is shared by hundreds of other environmentalists, concerned citizens, scientists, Congressional Representatives, educators and local residents living within Mendocino and Humboldt County.

1 The DEIR of 6/01/2007 is unacceptable, in its present form, because it does not develop or incorporate any of the alternatives, suggestions or recommendations made by environmentalists, which were made during periods allocated for public comment, over the last several years.

These suggestions have included that Jackson State Forest be developed to demonstrate additional uses for the forest, along with the development of alternative forest products, to allow a shift towards sustainable, long-term forest management, with a goal of conservation and protection of our precious natural resources and wildlife, to preserve them for our future.

2 The only alternative developed by the DEIR of 6/01/2007 is Alternative G. The "Notice of Availability, Recirculated Draft Environmental Impact Report" which accompanies this DEIR clearly states that, "This Recirculated DEIR addresses only the incorporation of another alternative to the original DEIR." Therefore, this DEIR is unacceptable, because it does not incorporate any of the suggestions and recommendations made by the public, if they were from an environmentalist's perspective. Alternatives besides Alternative G need to be developed, described and incorporated fully by the DEIR of 6/01/2007, or it should be considered deficient. The public needs to know the estimated environmental impacts of these various alternatives, before a meaningful decision can be made. Therefore, an acceptable DEIR should contain several fully developed alternatives which incorporate the suggestions of

3 thousands of environmentalists, including: 1. A ban on clearcutting, 2. Protections for

3 ct'd areas of the forest, to allow the forest to mature into a cathedral rainforest, complete with an intact canopy and thousands of Old Growth trees of various species, 3. Protections for the watersheds of the forest, to allow them to recover from the damage and destruction caused them by over a hundred years of clear cut logging, including both steam donkey logging, (which made skid rows of many of the forest's creeks and streambeds in the dry summer times of decades past) and tractor logging, (during which bull dozers pushed debris into creeks and streambeds, making roads across the creeks and streambeds at will, and destroying much of the priceless salmon habitat of the forest), and 4. Protections for the endangered species which make their habitats within the forest.

4 Additionally, the following main points should be included into any DEIR which is approved and developed into the future management plan for Jackson State Forest. Thus, the DEIR should be rewritten, to incorporate as many of the features, suggestions or recommendations, made by the public, as is possible, including all of the following:

5 1.) Long-term management and conservation measures should be incorporated into the DEIR for JSDF, which include the development of more ways to demonstrate educational, fire protection and research uses of the forest. More recreational uses for the forest should also be developed, with improved camping and hiking trails developed within the next few years. New camp grounds, showers, fire pits, parking and other recreational facilities should be developed, and these plans should be included as additional uses for JSDF.

6. 2.) The new DEIR should be long-term and comprehensive in its perspective, and be designed to achieve conservation goals for JSDF, over the long-term. A comprehensive DEIR should contain many of the features suggested by the concerned citizens and environmentalists of this area which should be fully detailed and described in the DEIR, complete with maps, tables and other relevant information needed for the consideration of the various proposals for the forest's future.

7. 3.) A large area of the forest should be set aside as a protected area, perhaps 9,000 acres or more, allowing it to develop into a fully mature, cathedral forest, complete with a high intact canopy which will protect the forest floor from erosion, which will in turn protect the tributaries and aquifers of the forest from siltation and sedimentation. This large protected area could be used by educators, environmental scientists, researchers, and fire prevention experts, to demonstrate their theories. Climate change could be effectively managed over the long-term, utilizing this method of providing environmental protections for large areas of the forest, while prohibiting clearcutting throughout the forest.

8 4.) Other areas of Jackson State Forest could be designated as demonstration areas for the development of new forest products which could be harvested sustainably from the forest. These new forest

2

products include pulp, firewood, poles, green mulch, dry mulch, along with the development of a mushroom harvest, hunting areas and fishing areas.

9 5.) Clearcutting should not be allowed in JSDF. It is extremely important to protect Jackson State Forest and allow it to recover from over a hundred years of environmental exploitation, degradation, and destruction. Therefore, all clearcutting should be banned from JSDF, to protect its critically important watersheds and its dependent endangered species.

10 6.) Additional, long-term wildlife and forest management plans need to be developed, which will protect the valuable natural resources and endangered species which live in, or are located within, Jackson State Forest.

11 7.) Fire protection measures should be developed for JSDF, including the systematic removal of combustible materials from the forest, which could include a tree thinning harvest, along with the removal of undergrowth. Fire prevention measures could also include the construction of "watch towers" and water reservoirs throughout the Mendocino Coastal Range, wherever they are needed. These fire prevention activities could be managed from and centered around Jackson State Forest and its firefighters, who are composed of both CDF Firefighters and CDC inmates. This labor force could be used to demonstrate both the implementation of fire prevention measures and the sustainable harvesting of at least two new crops, green pulp and poles, thereby generating revenue for the state.

12 8.) The new DEIR should include plans for the acquisition of further lands. Additional lands which lie adjacent to JSDF will become available at unknown dates in the future, and many of these adjacent lands are important for the management of the forest, along with the restoration of critical aquifers and watersheds which lie within the forest. For example, there may be adjacent lands which should be acquired so that the watershed for James Creek would lie wholly within the boundaries of the JSDF.

13 9.) Additionally, the boundaries of the forest need to be properly surveyed and marked, to protect the integrity of the forest, while also protecting the valuable natural resources which lie within the boundaries of the forest.

In conclusion, please refer the DEIR of 6/01/2007 to be rewritten, to include additional supplements, recommendations and suggestions made by the many concerned citizens of this area who made public comment, including

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environmental scientists, educators and some of the most prestigious Congressional Representatives from our state. In its present form, the DEIR of 6/01/2007, including the development of Alternative G, is unacceptable.

Thank you,

Sincerely,

James D. Smith
Founder, The Old growth Organization

7/13/2007

4

Mailed Letter GM-28

This response also serves to respond to RDEIR comment e-mail EC-94 which contained the comments on the same issues.

Response to Comment 1
The Board has received public input from hundreds of individuals over the course of the past several years. The alternatives considered cover a broad range and combination of forest management, resource protection, and restoration, including many management aspects that have been suggested or supported by individuals and organizations concerned about environmental protection.

Each of the alternatives considered, including Alternative G, include the demonstration of a wide variety of forest uses, including a range of forest products, and long-term sustainable forest management. One of the primary goals for forest management, as stated in the RDEIR, is protection and restoration of forest resources and native wildlife species and their habitats, both now and in the future.

Response to Comment 2
The DEIR included consideration of several alternatives. The RDEIR incorporated an additional alternative (Alternative G), which includes provisions and ideas taken from several of the other alternatives. This has been an appropriate and legal assessment process. The potential environmental effects associated with the alternatives have been considered and disclosed.

Response to Comment 3
Mr. Smith states than an "acceptable" DEIR should include a ban on clearcutting, protection for areas of the forest to allow old forest to mature, protection of watersheds, and protection for endangered species. As provided by Alternative G, no significant impacts are expected to occur. Although Mr. Smith has not indicated a specific environmental concern related to the use of clearcutting, clearcutting will be minimal, primarily associated with research. Additionally, a significant portion of the Forest will be managed to produce forest with late seral characteristics (RDEIR Table II.1). Over one-third of the Forest will be included in either a watercourse and lake protection zone, an old-growth grove, older forest structure zone, or late seral development area. These areas will be managed to produce large trees and a high level of canopy, consisting of trees of many species. The management of the Forest will incorporate provisions for protection and restoration of watersheds, partially in recognition of damages that resulted from historic logging operations (DEIR Sections VII.10 and VIII.4).

Another important provision of the EIR is long-term protection of endanged species and their habitats, including provisions for development of habitat for species that are associated with old forest (DEIR Section VII.6.6 and RDEIR Alternative G).

Response to Comment 4
The writer requests that the DEIR include several provisions (see responses below), but does not express an environmental concern in many cases.

Response to Comment 5
The writer requests that long-term management and conservation measures be incorporated into the DEIR. The DEIR is intended to consider the potential environmental effects of long-term management. The management plan incorporates long-term management and conservation measures. The writer requests that the DEIR include more ways to demonstrate educational, fire protection and research uses of the forest. This request is acknowledged. The management plan is dynamic, and can be adjusted or amended to include many educational, fire protection, and research uses of the forest, as long as the potential environmental effects of these practices are considered. The management plan and EIR may be amended in the future, should management measures with potential environmental effects be considered for incorporation. The Board acknowledges the writer's

request for more recreational uses of the forest, many of which are currently proposed (DEIR Section VII.14).

Response to Comment 6
The writer states that the DEIR should be long-term and comprehensive, designed to achieve conservation goals over the long-term. In fact, the EIR is both long-term and comprehensive, and is intended to achieve long-term management and restoration goals (DEIR Section VII.6 and 10). The writer states that the DEIR should include maps, tables, and other relevant information. These are elements of the current document (see DEIR Appendices for examples).

Response to Comment 7
The writer proposes that 9,000 acres or more of the forest be set aside as a protected area to provide protection of the forest floor and other watershed resources. The forest floor and watershed resources will be protected through implementation of the management plan, and no significant impacts are expected to occur (DEIR Section VII.10). The writer further states that climate change would be effectively managed. While the later concern is unclear, the potential impacts of forest management upon carbon sequestration and greenhouse gas production has been considered (DEIR Section VII.16). Climate change cannot be effectively managed alone through forest management or an absence thereof.

Response to Comment 8
The writer proposes that areas of JDSF be designated as demonstration areas for the development of new forest products that could be harvested sustainably. The products listed by the writer include pulp, firewood, poles, green mulch, dry mulch, and development of mushroom, hunting, and fishing areas. The Forest currently demonstrates sustainable use of many of these products. Fishing is regulated by the Department of Fish and Game. Currently, no fishing is allowed within JDSF, due to the presence of juvenile salmon and steelhead, and due to the fact that most JDSF streams are considered to be important spawning and rearing habitat for these species. The writer's suggestions are acknowledged.

Response to Comment 9
The writer states that clearcutting should not be allowed, and infers that clearcutting would prevent recovery of watersheds and endangered species. Significant impacts associated with clearcutting are not expected to occur. Clearcutting will be restricted to a small acreage each decade (RDEIR Alternative G, Page II-9). Where utilized, a number of measures and provisions will apply in order to protect watershed and wildlife resources. For example, streams will be protected by broad protection zones. Harvesting on steep slopes will be conducted by cable yarding machines, which prevents excavation and retains abundant soil cover. Clearcut unit sizes are limited by the Forest Practice Rules. Prior to implementation of harvesting, potential habitat for endangered species will be surveyed (e.g. marbled murrelet, northern spotted owl, endangered plants). If endangered species are found, harvesting is either deferred or modified to prevent significant impacts to those species. Please see DEIR Sections VII.6.6 and 10 for the assessment of potential impacts to wildlife and watersheds resources associated with harvesting.

Response to Comment 10
The writer suggests that additional wildlife and forest management plans need to be developed. The current planning process includes the development of a forest management plan and assessment of potential environmental effects associated with the management plan.

Response to Comment 11
The writer suggests that various fire protection measures be developed and demonstrated for JDSF, to include revenue generated from sustainable harvesting of green pulp and poles. These suggestions are acknowledged. Similar measures have and will be considered during management of the Forest. Please see DEIR Section (cite) for a discussion of fire prevention.

Response to Comment 12
The writer states that the DEIR should include plans for acquisition of additional land. This suggestion is acknowledged.

Response to Comment 13
The writer states that the boundaries of the Forest should be surveyed and marked in order to protect the integrity of the forest and it's natural resources. In fact, most of the Forest boundary has been surveyed, and survey monuments exist along the borders. The borders lines are periodically refreshed by both the Department and adjacent landowners when management activities are implemented that approach the property lines. The Forest Practice Rules include a notice requirement when timber operations are proposed in proximity to property lines. The incidence of cross-border encroachment or incidental damage to JDSF by adjacent landowners is extremely infrequent. Significant impacts associated with survey and property line marking are not expected to occur.

GM-30

RECEIVED BY

JUL 16 2007

BOARD OF FORESTRY
AND FIRE PROTECTION

July 7 2007

Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, Ca. 94244-2460
Attention: George Gentry, Executive Director

Re: Alternatives to Jackson Demonstration State Forest Management Plan

Dear Board Member:

I am a life long forester, a fifty year member of the Society of American Foresters, a graduate of Oregon State University in Forest Management, an ex employee of the U.S. Forest Service and private forest industry, a forest land owner, and at one time a purchase and operator, for my employer, of J.D.S.F. timber sales.

My forest experience goes from the rough and tumble resource recovery at all costs days of the 40's and 50's to the structured sustainable resource protection and recovery harvest processes practiced now in our forests.

I was disappointed to see that a new alternative G has surfaced as I believe that alternative C-1 should have satisfied all concerned except for the most radical preservationist who opposed alternative C-1 for specious reasons.

1 J.D.S.F. was sold by Casper Lumber Co. and acquired by the State of California for the purpose of research and demonstration and long term productive sustainable forest management, not for the slow erosion of these goal into its conversion into a park.

I have supported alternative C-1 for the following reasons:

2 1. The plan lists and answers the legitimate concerns of the previous citizens advisory committee.

3 2. Clear cutting, though allowed on a limited basis, would be carried out only for scientific reasons. Though the term "clear cutting" triggers negative reactions with the general public, it may be scientifically necessary to find where it works best for the environment in the long run.

4 3. Each harvest is to be planned around a specific harvest regime or demonstration to further the demonstration goals of the Forest.

5 4. Legislation regarding the Calif. Forest Practice Rules and relative to the Forest is quoted and followed in the E.I.R. And the C-1 Plan.

6 5. J.D.S.F. personnel have for decades recognized environmental concerns and been at the forefront in improving forest harvesting practices and the protection of streams and wildlife resources. Their one shortcoming has been in their inability to distribute to forest land owners and the general public the results of the myriad harvesting and other studies that have taken place on the Forest.

7 6. A timely approval of the E.I.R. and Plan C-1 would allow the return of management to the Forest and adequate funding, incentives, and direction to the J.D.S.F. staff so that the roads and other resources can be maintained along with an increased level of harvesting and scientific studies.

8 7. About half of the land here on the north coast is in coniferous forest. Demonstration harvest operations are needed which can show the private forest land owner how to cope economically with regulations and at the same time leave the forest in a productive state. J.D.S.F. can provide this information for both the industrial and non industrial forest land owners. State Forest Practice Rules, Fish and Game Department concerns, Water Quality Board Rules, and other agencies, constantly changing approach to timber harvesting presents challenges to the forest industry. The proper management of J.D.S.F. can be a tool to help the private forest landowner stay in business.
I had hoped the return from a selective harvest on our own tree farm would sustain us as my wife and I reach our 70's and 80's but my tree farm is currently in escrow at about 10 times what could be expected from a normal selective harvest. This is the result of the lack of local markets, risk of failure of the expensive permit process, and the fact that the value of small forest ownerships for weekend retreats far exceeds the lands economic harvestability without the risk.

9 8. The remaining mill capacity and harvesting operators on the north coast need the regular timber sales program the Forest provided in the past. A regular sales program helps maintain operational stability, the ability to capitalize equipment etc., and maintain a stable, capable work force.

10 9. We all recognize the acute housing needs in California. The proposed harvest volume of Plan C-1 provides the fiber needed to build upwards of 3000 single family dwellings per year rather than import this wood from outside the state as we do for most of our wood needs.

11 10. When California and Mendocino County are struggling to meet their budgetary needs J.D.S.F., if it can resume harvesting, can help in both areas. The last yield tax return from a full season of harvesting was in the neighborhood of $350,000. The income to the State from the Plan C-1 volume harvest level at current prices would be about $15,000,000 which should be used to support the management of the forest as provided in Plan C-1.

The E.I.R.projections of 240 timber jobs producing $7,600,000 in wages and 240 support jobs producing $4,700,000 in wages is too low an estimate. Though this figure, for our small county is impressive, the figures should be much higher as forest jobs generally produce about three or more support jobs. The E.I.R. also lists sales taxes from these wages as $162,000 so this figure which would be much higher to the benefit of our county.

12 11. We are facing increasing water and fire concerns here and elsewhere. Scientific harvest regimes to determine how transpiration and other tree processes effect stream flow and its timing are an example of one thing that is a point of argument with not much hard data available. The study of nutrient cycles under various cutting regimes is another example of the myriad of scientific studies that are possible. Then there is what I call the "faucet syndrome This is what the public does when they get water from faucet, when they get electricity from a wall plug or lumber from a lumber yard, etc. J.D.S.F. should develop a regular public tour system to enlighten at least a part of the public that trees can and need to be cut to provide a renewable resource supply for California instead of continuing our present environmental imperialism where we import from other states and countries. Also J.D.S.F. need to be able to distribute information relative to projects and results so that this material is available to private forest land owners and the public. All these possibilities take dollars. Alternative Plan C-1 will provide considerably more annual income to do a proper job. The immediate start up under Plan C-1 will get things going again.

13 Right now Mendocino county is California's Appalachia with few productive jobs available for our young people. All my children and grandchildren have left for other parts of California and the nation. We are known here in Mendoland as the place where we produce marijuana and meth rather than forest products, a commodity that none of us want to be without.
The five year hiatus in the timber sale program has not been helpful with this situation. What has been the real cost to Mendocino County and its citizens of this extended hiatus in the management of J.D.S.F.? We have lost jobs, small businesses, taxes and income from the shut down of the Forest

Now you as Board Members of the Board of Forestry can be a part of the solution rather than part of the problem. We need you to make a decision that will be a positive both environmentally and economically.

Sincerely

William F. Smith

275 Mendocino Place
Ukiah, California 95482

Mailed Letter GM-30

Response to Comment 1
The Board agrees with this statement.

Response to Comment 2
Support for Alternative C1 is noted. The May 2002 DRAFT management plan includes many provisions for long-term management. Many of the concerns of the former Citizen's Advisory Committee are addressed by the plan, either directly or indirectly. However, the Board cannot determine the degree to which these concerns were answered by the plan. This is not a significant environmental issue.

Response to Comment 3
Support for Alternative C1 is noted. The Board generally agrees with this statement. Clearcutting may occur under Alternative G, but on a limited basis.

Response to Comment 4
The Board generally agrees with this statement. This is similar to Alternative G, which emphasizes research and demonstration.

Response to Comment 5
The Board agrees that Alternative C1 is in compliance with legislation and the Forest Practice Rules.

Response to Comment 6
The Board is in general agreement with this statement. This is not a signficant environmental issue with respect to the current management planning process.

Response to Comment 7
The Board agrees that timely review and approval of the management plan is desirable.

Response to Comment 8
The Board agrees concerning the value of demonstration to private landowners.

Response to Comment 9
The Board generally agrees with this statement, and considers approval of the management plan to be a significant issue for the local economy.

Response to Comment 10
Each of the management alternatives considered will provide a significant level of timber production from JDSF, with the exception of Alternatives B and F. While Alternative G is expected to produce a somewhat lesser volume of timber in the coming decade, the long term sustained yield level is expected to be somewhat higher than Alternative C1, thus providing an increasing level of production over the coming decades. Significant impacts related to the level of production are not expected to occur.

Response to Comment 11
The EIR made use of appropriate and resource-specific economic analysis methods in estimation of jobs and wages, but the Board notes that other methods of estimation may be equally valid. Please see the economic analysis for a description of methods (DEIR Section III.5).

Response to Comment 12
The Board agrees with the writer's concerns regarding public education, tours, and dissemination of study results. The ADFFMP includes provisions to increase and improve these processes, and the anticipated revenue is capable of fully funding this activity. The Board anticipates that revenue will be sufficient to fully fund these activities, though the Board is not responsible for annual budgeting of Forest operations.

Response to Comment 13
The Board agrees that the years without normal management have come at a cost to the local economy. The Board and the Department have worked hard to return the Forest to full operation.

GM-33

PAUL V. CARROLL
Attorney at Law
5 Manor Place
Menlo Park, California 94025
telephone (650) 322-5652
facsimile (same)

July 16, 2007

George Gentry, Executive Director
California Board of Forestry
1416 9th Street
Sacramento, CA 95814

Re: Draft EIR for Jackson Demonstration State Forest Draft Management Plan and Alternative G

Dear Mr. Gentry and Members of the Board:

I write on behalf of Dharma Cloud Charitable Trust Foundation, The Campaign to Restore Jackson Redwood State Forest, and the public they represent regarding the Jackson Demonstration State Forest Management Plan, its draft EIR, and the recently circulated alternative G.

1 Under the California Environmental Quality Act (CEQA), the Board is obligated to consider the project's greenhouse gas (GHG) emissions in both the draft EIR and the recent alternative G. Unfortunately, neither document addresses the
2 project's cumulative contributions to GHG emissions, or mitigations and alternatives to reduce them.

Background

The Intergovernmental Panel on Climate Change of the United Nations has
3 concluded based on overwhelming evidence that global warming is occurring and is caused by human activity. The California Climate Change Center estimates that temperatures within the State will rise by 4.7 to 10.5 degrees Fahrenheit by 2100.

According to the California Climate Action Registry Forest Protocols Overview, the forest sector is the second-largest global source of anthropogenic GHG
4 emissions, contributing roughly 23% of total emissions. The Climate Action Team Report to Governor Schwarzenegger and the Legislature, estimates that the forest and agriculture sector contributes 8% of GHG emissions in California.

The forest sector produces GHG emissions in a variety of ways. When trees are cut down, they become a source of CO2 emissions. Although wood products may continue to store carbon for a time, large quantities of GHG emissions are also released to the atmosphere "immediately through the disturbance of forest soils, and over time through the decomposition of leaves, branches, and other detritus of timber production." (*Recognizing Forest's Role in Climate Change*, Union of Concerned Scientists (http://www.ucsusa.org/global_warming/solutions/recognizing-forests-role-in-climate-change.html).) "One study found that even when storage of carbon in timber products is considered, the conversion of 5 million hectares of mature forest plantations in the Pacific Northwest over the last 100 years resulted in a net increase of over 1.5 billion tons of carbon to the atmosphere." (*Ibid.*, citing Harmon, M.E., W.K. Ferrell and J.K. Franklin. 1990. Effects on carbon storage of conversion of old-growth forests to young forests. *Science* 247: 699-702.)

5

Besides release of GHG emissions from logging itself, there is another major source of emissions, namely equipment operations and facilities management. As the draft EIR recognizes, CDF's equipment and facilities contribute so many GHG emissions that they "are likely to substantially offset any sequestration credits." (Draft EIR, p. VII.16-2.)

6

After public comment closed on the draft EIR, the Governor signed the historic California Global Warming Solutions Act of 2006, codified at Health and Safety Code, section 38500 et seq. (AB 32.) The new law requires reduction of the State's GHG emissions to 1990 levels by 2020.[1]

The Draft and Alternative G Fail to Consider the Project's GHG Impacts

CEQA requires consideration of cumulative impacts. A project's GHG emissions, especially a project as large as the management of JDSF, are a quintessential cumulative impact. This is not a novel theory. Recently, the State, represented by the Attorney General, criticized the Sacramento Area Council of Governments' draft EIR for the Metropolitan Transportation Plan for 2035, because it failed to consider the cumulative impacts of GHG emissions, and alternatives and mitigations addressing them.

7

The same criticism applies here. The draft EIR and alternative G do not

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[1] Since AB 32, California's historic legislation acknowledging the anthropogenic cause of climate change was not enacted until after the close of comment on the draft EIR, it constitutes new information under CEQA, allowing comment on the draft EIR now.

8 The same criticism applies here. The draft EIR and alternative G do not acknowledge that the project will increase California's GHG emissions, making it more difficult to comply with AB 32, let alone do they discuss mitigations or alternatives to offset the impact.

Instead, the two documents merely observe that the different alternatives sequester different amounts of carbon. But this is not the issue. Even the environmentally superior alternative involving the least amount of logging and sequestering the most carbon will still cause a cumulative impact by producing a net increase in GHG emissions.

9 Although it is not for the public to mitigate the Board's project, many mitigations and alternatives suggest themselves. Obviously, an alternative aimed at restoring the forest to its old-growth condition with minimal logging would have the best sequestration to emissions ratio. A mitigation banning clearcuts would reduce emissions. And surely there are numerous energy-saving strategies CDF can apply to its facilities and equipment operations.

10 If the Board insists on approving the EIR without mitigating GHG emissions to a level of insignificance, it must provide a statement of overriding considerations.

11 In short, the draft EIR and alternative G are flawed under CEQA. They wholly fail to evaluate the project's contribution to the most significant environmental issue facing California and ways to mitigate it.

Very truly yours,

Paul V. Carroll

Mailed Letter GM-33

Response to Comment 1
The Board agrees that greenhouse gas (GHG) emissions and more generally, climate change, should be considered under CEQA. Anthropogenic contributions to climate change through GHG emissions have the potential to be a significant environmental effect either on a project basis or cumulatively.

Response to Comment 2
Both the DEIR (section VII.16) and RDEIR (section III.16) address greenhouse gas and climate change issues related to management of JDSF. Column 8 of Table II.19 in the RDEIR identifies net carbon dioxide sequestration for the eight alternatives over a 100-year analysis horizon. This analysis shows substantial positive carbon sequestration benefits for all of the alternatives. The RDEIR also discusses how the changes that Alternative G [or the Administrative Draft Final Forest Management Plan (ADFFMP)] would make to Alternative C1 would increase net carbon sequestration. This result is reflected in Table II.19, which shows that G would sequester a net CO_2 equivalent of 7,280 thousand (M) tons of carbon at the end of 100 years, versus 6,044 M tons for Alternative C1, or a 20 percent increase.

A more detailed analysis also would include an emissions accounting from the forest including vehicles and buildings that are owned by the Department and are associated with management, and emissions from harvesting and manufacturing. We chose to do the downstream accounting, although this will be the most conservative accounting approach because we are not including the negative substitution effect that occurs when alternative higher-GHG-impact building materials such as steel and concrete are used instead of wood products.

Emissions from vehicles and buildings are estimated as follows:

Vehicles: 0.10 thousand (M) tons per year x 100-year planning horizon = 10.1 M tons
Building: 0.00003 M tons per year x 100-year planning horizon = 0.003 M tons

This is a total of 10.103 M tons for the 100-year planning horizon.

Harvesting emissions include in-woods emissions from equipment and vehicles and transportation to a mill. Mill emissions estimates from processing are included because long-term storage of wood products is included in the EIR and this is a consistent approach. Mill emissions include sawing, drying, energy generation, and planning. Also, transport to final destination is included. The entire life cycle for green-dried lumber is included (Puettmann and Wilson 2005). This is a total emission estimate of 0.13 metric tons CO_2 equivalent per thousand board feet (MBF).

An examination of Table III.19 in the RDEIR shows the minimum harvest at 0 (Alternative A) and the maximum harvest at 4,259 MMBF (Alternative B), 3,789 MMBF (Alternative C1), and 2,049 MMBF (Alternative G) over the 100-year planning horizon. This equates to zero, 554 M tons, 493 M tons, and 266 M tons of CO_2 equivalent from harvesting emissions respectively, using the above-noted factor from Puettmann and Wilson (2005). Including vehicle and building emissions, the total figures are 10 M tons, 564 M tons, 503 M tons, and 276 M tons of CO_2 equivalents for Alternatives A, B, C1, and G, respectively. As a percentage of the total carbon sequestered by the four alternatives, per column 8 in Table III.9, the emissions including full life-cycle of wood, vehicle, and building emissions, the range is 0.1%, 9.1%, 8.3% and 3.8% respectively. Thus, emissions as a percent of net carbon sequestered are quite small, particularly for Alternatives A and G.

Given the general levels of uncertainty in the analysis and the relatively small proportion of emissions from full life cycle and overhead from forest management, this additional information does not alter the comparative information contained in Table III.19, or the general conclusions of the DEIR or RDEIR regarding carbon sequestration and JDSF management.

Since the net amount of carbon that would be sequestered by any of the alternatives, including C1 and G, or the ADFFMP, is greatly higher than the amount of carbon that will be released by Forest management, there are no significant adverse cumulative impacts to be mitigated. In fact, significant beneficial impacts of net carbon sequestration will occur.

Response to Comment 3
As a point of clarification, your letter states that the Intergovernmental Panel on Climate Change (IPCC) "… has concluded based on overwhelming evidence that global warming is occurring and is caused by human activity." The actual language used by the IPCC is somewhat more cautious. The following is from the IPCC policy summary (IPCC 2007).

> Most of the observed increase in global average temperatures since the mid-20th century is *very likely* due to the observed increase in anthropogenic greenhouse gas concentrations. This is an advance since the TAR's conclusion that "most of the observed warming over the last 50 years is *likely* to have been due to the increase in greenhouse gas concentrations."
> [Emphasis in original.]

Response to Comment 4
The Board and Department are familiar with both the California Climate Change Center (CCCC) and the California Climate Action Registry (CCAR). In particular, please note that the State Forests Research Coordinator is listed as one of the researchers in the CCCC summary document (CCCC 2006) and is serving as the Department's representative in training and oversight of the third party certifiers for the CCAR Forestry Protocols. This is another example of how expertise acquired through work on the Demonstration State Forests is helping to manage programs statewide.

The 23% of emissions attributed to the forest sector is global and primarily attributed to the tropics (Denman et al. 2007). The Climate Action Team estimate cited can be misleading with respect to the forestry sector, because it also includes the agriculture sector, which is massive in California.

A more detailed inventory of California GHG emissions than the cited Climate Action Team Report is the California Air Resources Board's Draft California Greenhouse Gas Inventory (California Air Resources Board -- Draft Updated Greenhouse Gas Emissions Estimates - Full Detail, August 22, 2007; posted on the Internet at http://www.arb.ca.gov/cc/ccei/emsinv/emsinv.htm;). Note that these figures are under review and are subject to revision. The 2004 (most recent information available) gross emissions figures for the specific categories and subcategories related to California's forest products industry and forestlands are as follows:

IPCC Category Related to Forest Products Production and Forest Land	2004 Gross Emissions (million metric tonnes of CO_2 equivalent)	% of Total Gross CA Emissions
1A2 Manufacturing Industries and Construction		
1A2d Pulp, Paper, and Print	1.086	0.22%
1A2j Wood and Wood Products	0.106	0.02%
3B1 Forest Land	0.164	0.03%
Total	1.356	0.27%

At the same website as above, the Air Resources Board presents draft figures on net CO_2 flux for Land Use, Land Use Change, and Forestry. These figures include carbon fluxes related to forests, rangeland, and agriculture and cannot be fully disaggregated to capture forests only. However, even the most cautious analysis of these numbers from a forestry perspective indicates that there is a net negative CO_2 flux from forestry. That is, forest land use in California results in a net *decrease* in atmospheric carbon, not an increase. Again, we note that these draft numbers are under review and are subject to change.

Response to Comment 5
The harvesting of trees does cause emissions of CO_2, which we analyzed in our climate change sections of the DEIR (p. VII.16-1 to -5) and RDEIR (p. III-157 to -160). In all scenarios there was a net negative emission of GHGs. This was because more biomass was being conserved than destroyed. In other words, we are proposing to harvest less biomass (and to emit less CO_2) than growth.

Average redwood forest carbon pools, as a percentage of standing carbon, were estimated as follows (EPA 2000): 4.4% in understory, 9.7% in down dead wood, and 60.0% for soil and forest floor. The estimates provided in the DEIR analysis assume a long-term steady-state condition for non-merchantable portions of the carbon pools. The long-term steady-state approach utilized accounts for the short-term emissions such as soil disturbance and leaf and branch decomposition that are not explicitly addressed in RDEIR Table II.19. Also, forest practices to protect the soil resource are applied on JDSF. Intensive practices, such as litter raking, which had detrimental effects in some European forests, do not occur and are not planned for JDSF.

The cited study by Harmon et al. (1990) focused on the conversion of natural old-growth forests—not the “mature plantations” quoted—to young growth forests. JDSF is today predominantly a young growth forest, with only 650 acres of old-growth groves remaining. These groves would be protected under all alternatives. The proposed management would only treat non-old-growth areas of the Forest.

Response to Comment 6
Sources of JDSF management related emissions besides harvest are equipment operations and facilities management. When considering these sources of emissions directly related to the management of the state forest, they are small compared to the amount sequestered (please see response to Comment 2).

The Department as a whole is quite large and manages a vehicle and aircraft fleet that is the third largest fire department in the Country. While we are tracking Department-wide emissions as a monitoring tool to meet targets for GHG reduction, expecting to wholly offset Department-wide emissions using JDSF is impractical. As indicated in RDEIR Table II.19, the alternative with the greatest potential to sequester carbon on JDSF is Alternative A. However, this alternative provides for almost no management activity on the Forest and would not comply with the direction of existing statutes and Board policies for the management of JDSF. Further, Alternative G or the ADFFMP would sequester only 6% less net CO_2 than Alternative A would sequester, per column 8 of Table II.19.

The Department is a member of CCAR and does follow the reporting criteria for entity reporting, including the state forests. CCAR is recognized by AB32 and the registry procedures and protocols are anticipated to be incorporated by the new regulatory structure. The Board and the Department are actively working with the California Air Resources Board, the lead agency for addressing climate change and greenhouse gases, to identify address GHG emission and climate change issues related to forest management. The Department will comply with all relevant regulatory outcomes of AB 32.

Response to Comment 7
As indicated in the response to Comment 2, all of the alternatives, as well as the ADFFMP, would result in a net sequestration of carbon when carbon released from forest management activities is compared to the carbon sequestered in tree growth and long-lived forest products. Thus, there would be no negative GHG environmental impact from JDSF to combine with GHG emissions from other sources to potentially result in a significant adverse cumulative effect.

The Sacramento Area Council of Governments draft EIR example cited is with respect to a significant cumulative emission over time from many small sources (motor vehicles). In a similar issue to the one cited, the Attorney General sued the County of San Bernardino (San Bernardino County Superior Court Case No. CIVSS 700329). This case was recently settled with the County agreeing to a thirty-month public process to reduce GHGs attributable to land use decisions and County government

operations. Land use planning (e.g., a change in land use or zoning) is not a consideration for this EIR. Second, the proposed JDSF management would result in net carbon sequestration, not the likely net carbon emission of the cited county planning cases. Thus, these cases are not directly applicable.

However, operations of JDSF and the Department coincide with the general requirements of this settlement: inventory of current and past emissions. This inventory is required by the Department's membership in CCAR and will be reviewed by a third party certifier.

Response to Comment 8
Specifically, the author is incorrect, this project will not increase California's GHG emissions and therefore no mitigation is warranted. See response to Comment 2. Also, the discussion of Alternative G in the RDEIR specifically identifies how Alternative G, relative to Alternative C1, incorporates six measures that provide increased opportunities for carbon sequestration at JDSF (RDEIR at p. III-158).

Response to Comment 9
The Department does follow procedures that are mandated for all state agencies to assist in reducing emissions to meet state targets. This includes telecommuting policies, carpooling incentives, mass transit reimbursements to employees, flexible fuel vehicles, energy conservation programs at facilities, etc. This does not have a direct bearing, however, to this project, as no significant negative environmental effect has been identified. See also the response to Comment 8.

The proposed mitigation of managing JDSF to restore the entire forest to old-growth conditions, with minimal logging, would not be consistent with existing statutory and Board policy direction for the Forest, which require an active and diverse timber management program. While not banning it completely, Alternative G and the ADFFMP include significant limitations on the use of clearcutting on JDSF.

Response to Comment 10
Since no significant adverse environmental effect is present, therefore no overriding consideration statement is necessary.

Response to Comment 11
See response to above comments.

Sequestration of carbon is one facet of climate change and forests. Another is adaptation to climate change. As the premier research forest in the *Sequoia sempervirens* ecotype, we have a responsibility to promote research into forecasting the likely effects of climate change on the forest and to make management recommendations to conserve this uniquely Californian resource.

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GM-36

Northern California
SOCIETY OF AMERICAN FORESTERS 1900

NorCal SAF Office – P.O. Box 339, Camptonville, CA 95922 - www.norcalsaf.org

July 16, 2007

Mr. Stan Dixon, Chair
California Board of Forestry
and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

RE: Recirculated Draft EIR for Jackson Demonstration State Forest Management Plan

Dear Mr. Dixon,

The Northern California Society of American Foresters applauds the efforts that have been made to update the Jackson Demonstration State Forest Management Plan (JDSF Plan) and support efforts to return the forest to a productive status. We especially applaud the direction to increase research into uneven-aged management in the forest types of coastal Northern California as this has received less attention in the past than other types of management. We do, however, have concerns about portions of proposed Alternative G for the JDSF Plan. Those concerns include:

1 • ***Alternative G limits even-aged management without explaining the need for this limitation.*** The alternative proposes to limit even-aged management to not more than 100 acres per decade unless there is a special and justified research need for that type of management, which will then make an additional 400 acres available per decade. Also, decisions on whether the proposed even-aged silviculture is appropriate are placed in the hands of an advisory committee, whose make-up is yet to be determined. Silviculture decisions should be made by professional foresters based on site-specific conditions as needed for stand and ecosystem health. To have an "advisory committee" make silviculture decisions risks the potential, in theory and possibly in fact, of that committee practicing forestry without a license.

2 • ***Alternative G limits the use of herbicides.*** As has been well documented on the north coast, as well as throughout California, noxious weeds are an increasing problem in forested landscapes. The severe restriction, and potential elimination, of this tool does not seem to be a wise or forward thinking direction. Given the restrictions on use already provided in California law and the required licensing of those individuals directing application of those chemicals, the appropriate use of herbicides is a well considered and necessary tool to improve forest health throughout California. It has been argued that other mechanical means

including use of goats or humans to browse and/or mechanically remove noxious weeds is a better methodology. However, the extensive nature of the weed problem combined with the availability and willingness of people to volunteer for this activity makes this a not particularly effective method of control. With grazing animals, it is also difficult to tell them which plants to eat and which to leave alone. Herbicides can effectively and economically be used to control noxious weeds in a safe and prudent manner.

3 • ***Alternative G promotes conversion of much of the forest into a late-seral condition, which may not be appropriate.*** Table II.2 in *Alternative G, Part II Alternative* indicates that the alternative proposed to recruit more than 1/3 of the forest into a late-seral condition for the benefit of the marbled murrelet. While this is a worthy consideration, this designation may come at the expense of other species that may require a greater variety of habitats. Also, one of the purposes of the state forest system is to demonstrate management techniques that are appropriate on private timberlands throughout the applicable region.. Given that most private lands are not managed to this extent for late-seral conditions, it would seem appropriate to limit the recruitment of this habitat type in favor of habitats that are more often found on private forest lands in order to find ways in which those private lands can support a greater diversity of wildlife species and their habitats.

4 • ***Alternative G reduces the level of harvest available from the forest.*** The goal of forest management in California is to produce high quality forest products in a sustainable manner over the long term. This alternative proposes to harvest approximately 45% of the growth and 0.9% of the inventory in the first decade, with the harvest volume representing a decreasing portion of the standing timber. If growth and health are to be managed at sustainable levels, the amount of harvest will need to be *increased* over time.

We fully support the return of Jackson Demonstration State Forest to productive management and support the efforts of the Board in this direction. However, Alternative G seems to do a poor job of meeting some the listed goals for this management plan. We believe that Alternative C1, while flawed, better meets the needs of the Jackson Demonstration State Forest.

Sincerely,

Michael de Lasaux, Chair
Northern California Society of American Foresters

The Northern California Society of American Foresters (NorCal SAF) represents over 600 professionally trained foresters in Northern California. It is the mission of the Society of American Foresters to advance the science, education, technology, and practice of forestry; to enhance the competency of its members; to establish professional excellence; and to use the knowledge, skills, and conservation ethic of the profession to ensure the continued health and use of forest ecosystems and the present and future availability of forest resources to benefit society.

NorCal SAF is comprised of eleven chapters. Founded in 1900 by Gifford Pinchot, the Society of American Foresters is the national organization representing the forestry profession in the United States. One of Society's core values is the sustainable management of forests for the benefit of wildlife, landowners, and society.

OUR JOB IS GROWING

❖ STEWARDSHIP HOT LINE 1 (800) 738-TREE ❖

Mailed Letter GM-36

Response to Comment 1
The limitation is necessitated by public opinion and strong sentiment against clearcutting by the general public. The comment does not correctly portray the proposed Management Plan. The management limits clearcutting, i.e. the even-aged regeneration harvest step with no residual stocking left on site, to less than 500 acres per decade. Table 2 in the proposed Management Plan shows that even-aged silvicultural systems including various forms of residual leave tree retention systems, can potentially occur on up to 12,788 acres or 26 percent of the Forest. Regeneration harvests under these systems is not limited to 500 acres per decade.

It is expected that the advisory committee will make recommendations, not decisions, on general management direction. On-the-ground implementation decisions will be made by registered professional foresters.

Response to Comment 2
The comment is noted. Limitations on herbicide use are necessitated by public opinion and strong sentiment against their use by the general public.

Response to Comment 3
The Board recognizes that the primary purpose of JDSF is to demonstrate management techniques that are appropriate on private timberlands, private timberlands are generally not managed to a great extent for late seral conditions, and JDSF needs to maintain forest structures reasonably typical of private timberlands in order to be able to deliver relevant research and demonstration project. At the same time, a large segment of the public wants to see JDSF produce other resource values such as recreation, habitat and recovery habitat for endangered species. Table 1 in the proposed Management Plan is viewed as the optimal set of desired future conditions given JDSF's management situation.

Response to Comment 4
The Board recognizes that the generally mandated legal and Board policy goals of JDSF include maximum sustained production of high quality forest products (MSP). The actual level of maximum sustained production that can be realized however, will depend on the emphasis that is placed on protection of other resource values. On a private ownership where there are few if any restrictions on timber production from other resource values, MSP will probably be close the biological growth of the forest. On a public research forest like JDSF, with additional management goals other than timer production and a large number of restrictions on timber management from public trust resource values, MSP will predictably be less than growth.

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

GM 37

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:

1 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

2 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

3 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?

4 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

Tel: 707 937-3001 restore@jacksonforest.com www.jacksonforest.com

4 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.

5 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:

6 > 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

7 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.

8 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.

9 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.

10 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:

10 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.*

11 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:

12 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 13 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 14 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:

15 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

15 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:

16 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:

17 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

18 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.

4

Mailed Letter GM-37

Comment 1
Comment noted. The Board is indeed interested in seeing operations resume at JDSF.

Comment 2
Alternative G contains many provisions in direct or close alignment with the recommendations of the Mendocino Working Group. The Board acknowledges that not all of the Mendocino Working Group's recommendations are fully incorporated into Alternative G or in the Administrative Draft Final Forest Management Plan based on Alternative G. The Board has received a letter from the Mendocino County Board of Supervisors indicating their support of the Mendocino Working Group's recommendations.

Comment 3
Comment noted. The Board believes that it is critical that any individual element of Alternative G's Goals and Objectives for the management of JDSF, as presented in Appendix 1 of the 2007 RDEIR, be read in the context of all the Goals and Objectives, as well as the specific management actions that are provided by the alternative. Forest restoration, ecology, and watershed process are among the management subjects proposed for demonstration and research, though some research and demonstration will involve other aspects of forest management.

Comment 4
Neither Alternative G nor the Administrative Draft Final Forest Management Plan based on Alternative G proposes large scale clearcutting for demonstration or any other purpose. The Board believes that some very minor level of clearcutting will continue to be appropriate for demonstration purposes, as well as purposes such as research, securing regeneration under certain stand conditions, and addressing forest health problems. Alternative G and the Administrative Draft Final Forest Management Plan based on Alternative G reflect this consideration. A considerable amount of even-aged management, including clearcutting, occurs on private timberlands within the redwood region. Even-aged management is considered a viable form of redwood forest management. The potential effects of this broad form of management should be studied in greater detail, and much remains to be learned about securing the positive effects and avoiding the potentially negative effects associated with even-aged management.

The Board agrees that "We need to develop better understanding of how to manage forests in ways that are economically viable and reverse the negative impacts of previous industrial logging on coastal redwood lands," and believes that Alternative G or the Administrative Draft Final Forest Management Plan based on Alternative G would provide ample direction and opportunity to contribute to this understanding. See Goals #1-4 (Appendix 1) and, for example, the direction for establishment of the Older Forest Structure Zone and late seral development areas (pages II-6 to II-10) in the RDEIR.

The Board also notes that JDSF is not exclusively composed of coastal redwood forest, though this is the principle forest type present (DEIR Section VII.6.2-2). Other forest types present include various forms of redwood/Douglas-fir/hardwood association, and the red alder, pygmy cypress, and bishop pine series. Vegetation communities include Mendocino pygmy forest, sphagnum bog, wetlands, and grassy openings.

Comment 5
See response to comment 3. Maintaining "a diverse, dynamic matrix of forest habitats and seral stages to provide a broad range of forest conditions available for research and demonstration" is an appropriate objective under the expressed broader goal statement for Goal #1 Research and Demonstration.

The Board has received comments from a number of university-affiliated faculty and staff that emphasize the importance of the availability of a diverse mix of forest stand conditions for research and demonstration.

Comment 6
See response to comment 3. It should be noted that Alternative G and the Administrative Draft Final Forest Management Plan based on Alternative G establish research and demonstration as the primary purpose of JDSF management, not "furthering ecologically beneficial forest management." However, a theme of ecologically beneficial forest management plays throughout the Goals and Objectives and the various specific management practices directed for JDSF. See, e.g., Goal #2 Forest Restoration, Goal #3 Watershed and Ecological Processes, and the direction for establishment of the Older Forest Structure Zone and late seral development areas (pages II-6 to II-10) in the RDEIR.

Comment 7
Evenaged management and group selection are not limited "solely to provide a broad range of forest conditions for research and demonstration" by Alternative G and the Administrative Draft Final Forest Management Plan based on Alternative G. Rather, these documents establish broad goals and objectives for timber management (see Goal #4 Timber Management and its Objectives). Alternative G and the Administrative Draft Final Forest Management Plan permit the use of evenaged management for addressing forest health and problematic regeneration conditions (RDEIR p. II-9; Chapter 3 in the Administrative Draft Final Forest Management Plan). The forest structure goals for JDSF are achieved though the application of a broad range of silvicultural methods, including evenaged management and group selection. The RDEIR (p. II-6) and the Administrative Draft Final Forest Management Plan (Chapter 3) indicate that the achievement of "a broad range of valuable habitats" also is a purpose of forest structure goals.

Comment 8
While very important, ecologic benefit is not the sole determinant of actions under the proposed management of JDSF under Alternative G or the Administrative Draft Final Forest Management Plan based on Alternative G. Goal #2 Forest Restoration and Goal #3 Watershed and Ecological Processes are very importance goals, as indicated by their ranking. However, they are not the primary goal—i.e., Goal #1 Research and Demonstration—nor are they or any other goals exclusive. See response to comment 3, above. The potential effects of various forms of even-aged management upon habitat development, in particular, are not well understood, and would benefit from further demonstration and investigation. For example, the Northern Spotted Owl appears to benefit from the forest edge that is produced along the borders of even-aged management units, due to the production of prey for the species that occurs in or near this edge. Other species, such as the Purple Martin and the Vaux's Swift, appear to benefit from the presence of large nesting structures present in forest openings. A host of other, more common species, benefits from the new vegetation that regenerates within even-aged management units.

Comment 9
Comment noted.

Comment 10
See response to comment 7. The group selection silvicultural system is widely used, due to the benefits that the system provides, not just from the standpoint of timber production, but also due to habitat, watershed, and aesthetic considerations. Group selection results in a diverse set of forest conditions available for wildlife, by creating a mix of age classes across the landscape, while coincidentally maintaining canopy cover at the broad scale. Group selection is beneficial for successful regeneration and subsequent growth of tree species that are relatively intolerant of heavy shade. The system also produces small even-aged groups of trees, much like those that are created through natural disturbance processes in the wild (Smith, David M., 1986. The Practice of Silviculture, 8th Edition, John Wiley and Sons, p. 432.). Potential watershed effects are mitigated by the fact that a large proportion of canopy and ground cover are generally retained at the stand level.

Comment 11
The quoted RDEIR language on forest structure goals is consistent with the primary emphasis placed on research and demonstration (e.g., see Goal #1 Research and Demonstration in RDEIR Appendix 1) by Alternative G and the Administrative Draft Final Forest Management Plan based on Alternative G. See also the response to comment 3, above.

Comment 12
The text of the RDEIR (p. I-8) already indicates this:

> During this initial implementation period, the department and the Board will seek further input on management direction from these advisory entities, including long-term forest structure goals for the Forest and silvicultural treatments to be applied (e.g., forms and amounts of even-aged and uneven-aged management).

Comment 13
Comment noted. The Board has reviewed and considered the referenced three letters from the Mendocino Working Group. Many of their recommendations are reflected in Alternative G and the Administrative Draft Final Forest Management Plan. The three referenced letters speak to desired management goals, approaches, and processes. They do not specifically identify any potential significant potential environmental impacts that have not been mitigated through the EIR process.

Comment 14
Comment noted. See also response to comment 2, above.

Comment 15
The existence and activities of a JDSF advisory body is not per se related to the potential for environmental impact from management of JDSF.

Alternative G and the Administrative Draft Final Forest Management Plan establish a deadline of three years to provide the advisory group an incentive to complete its work in developing its management plan recommendations. Absent a specific deadline for this product, management of JDSF would have to continue under the burdensome initial implementation period management restrictions for an indefinite period if the advisory were to fail to complete its responsibilities in a timely fashion. Given the contentious environment that has surrounded the management of JDSF for some time, the Board can easily envision an advisory body taking a very long time to complete its work, absent a fixed deadline. In any case, the Board and Department will seek to manage the advisory group management plan review process in such a way as to arrive at a set of recommendations from the group as expeditiously as possible.

Comment 16
Harvest volumes during the initial implementation period under Alternative G are inherently limited to a great extent by the substantial harvesting restrictions imposed during this period (see RDEIR p. II-12 or the Administrative Draft Final Forest Management Plan Chapter 3).

Comment 17
The Board recognizes that there may be controversy associated with proposals to manage stands within specific areas of JDSF. In fact, any proposal to conduct timber operations may be controversial to some individuals. The management plan and EIR consider the potential for environmental effects to occur, and also provide for measures that that are intended to substantially reduce potential controversy. It is not the Board's intention to necessarily avoid all controversy, but to manage the Forest in compliance with the legislative mandate and existing policies, while avoiding significant environmental effects.

The Mendocino Working Group, as a whole, and some members of that group individually, have expressed concern over short-term operations within the majority of JDSF (stands regenerated prior

to 1925 and those areas depicted on RDEIR Map Figure 2 with an average of ten trees or more per acre greater than 30 inches in diameter). The Mendocino Working Group, and some individual members of the group, propose that harvest be limited to less mature stands, such as the majority of those proposed for the initial period within RDEIR Table II.3. With the exception of the two currently enjoined harvests (Brandon and Camp Three), the short-term harvest schedule for Alternative G (Table II.3 in the RDEIR) proposes a few timber harvests, located in areas defined as controversial by the Working Group, that are intended to go forward during the initial implementation period without review by an advisory body. These are harvests for which a substantial amount of timber harvesting plan preparation has already occurred and which are essential to effective management of the Forest, including revenue production to support the forest management and research program. Harvesting on these stands will be constrained to retain approximately 70% of the preharvest stand basal area and to maintain stand mean stem diameter approximately equal to or greater than the preharvest level. The Board believes that these very significant harvest restrictions will substantially address the Working Group's concerns about not taking actions during the initial implementation period that would limit future management options.

Comment 18
Comment noted.

GM-38

Staub Forestry & Environmental Consulting STAUB

July 16, 2007

Mr. Stan Dixon, Chairman
STATE BOARD OF FORESTRY AND FIRE PROTECTION
P.O. BOX 944246
SACRAMENTO, CA 94244-2460

Dear Chairman Dixon and Members of the Board,

As a Registered Professional Forester with more than 30 years experience managing coastal redwood forests and a member of committees associated with the State Forest system, I am emailing this last minute letter to underscore my concerns about several provisions of Alternative G in spite of my support for most of the objectives and management policies and measures presented in that alternative. My points can be summarized as follows:

1 1. I believe the emphasis on late seral or old growth and older forest structure zones in Alternative G is excessive and should probably not exceed roughly 30% of JDSF's timberland acreage. The State Forest mandate is to research and demonstrate management for the private timberlands of California and that requires flexibility of approach and more active management than is apparently envisioned in Alt G where such type would cover from 25% to 45% of the forest's area.

2 2. I can find no reason to support interim or initial and short-term harvest limitations and schedules. The FMP and EIR have presented an extraordinary amount of highly detailed and complex information quite capably and responsibly. It is time to start the process of research and demonstration that have been held in abeyance these last years and have those measures occur over a long enough period that there will be some hope of obtaining useful information. The FMP and EIR process recurs at least every 10 years with provisions for 5 year review. The Board can review anything about JDSF at any time if and when the need arises. Adopt and implement the plan you choose. Do not add another layer of procedure and potential obstruction.

3 3. I support your adoption of an alternative that increases allowable harvest to something closer to alternative C1. Maximum sustained production is partially defined by economics and a harvest target of at least 50% of forest growth seems like a minimum target.

4 4. I oppose any new restrictions of herbicide use on JDSF. I have recently worked with CNPS members and State Parks ecologists to prevent unnecessary restrictions on intelligent use of heribicides in our efforts to save native flora from the threats of invasive plants.

5 5. Advisory committee composition and roles should reflect JDSF's status as a statewide resource while recognizing the value of local input that deals with site specifically local issues.

Thank you for consideration of my comments.

Sincerely,

Stephen R. Staub, RPF #1911

6010 Highway 9, Suite 6 Felton CA 95018 Phone 831. 335.1452 Fax 831. 335.1462 staubtre@pacbell.net
Stephen R. Staub, Registered Professional Forester License No. 1911
Cassady Bill Vaughan, Registered Professional Forester License No. 2685
Chevenne Borello, Registered Professional Forester License No. 2784

Mailed Letter GM-38

Response to Comment 1
The Board agrees that a mandate for the state forest is research and demonstration of management for the private timberlands of California. Forest ownership in California is quite diverse, and there is growing recognition of management that considers a range of objectives. As such, the Board believes that JDSF should reflect the range of forest conditions and management objectives that exist within the region. This will provide a working laboratory with a dynamic matrix of forest conditions available for research and demonstration. Please note that the proposed portion of JDSF designated for any given condition represents a range that is expected to vary through time, due to new information, management, ecological, societal, and policy-related adjustments.

Response to Comment 2
The intent of the interim harvest limitations is to allow the Board and the various advisory entities an opportunity to examine JDSF management and planning in detail, while precluding operational management that would limit long-term options. This is not a significant environmental issue.

Response to Comment 3
The allowable cut estimate is not an exact limitation, but an estimate of what will be produced, given the management objectives and constraints. A more exact estimate will result from the Option "a" process for estimating long-term sustained yield (LTSY). At the present time, while the annual allowable cut may be somewhat less than that for Alternative C1, the LTSY estimate is higher under Alternative G.

Response to Comment 4
Alternative G does not impose new restrictions on the use of herbicides for control of invasive species. However, it does increase the level of consideration, including that of alternative treatments, prior to using herbicides.

Response to Comment 5
The Board generally agrees with this statement. The committees are intended to be purely advisory.