IV.16 Individual RDEIR Mailed Comments GM-39 to GM-40

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.

JULY 12th, 2007

GM-39

BRUCE CAMPBELL
1158 26th ST. #883
SANTA MONICA, CA 90403

BOARD of FORESTRY and FIRE PROTECTION
P.O. BOX 944246
SACRAMENTO, CA 94244-2460

RE: COMMENTS on RECIRCULATED DRAFT EIR for the DRAFT JACKSON DEMONSTRATION STATE FOREST MANAGEMENT PLAN

DEAR BOARD OF FORESTRY and to whom it may concern:

1. It is highly disturbing to see that under new Alternative G in the Recirculated Draft EIR that the Caspar Creek and Jughandle Creek watersheds are not included in the Marbled Murrelet recovery zones for the Jackson forest. Seeing that murrelets currently inhabit Russian Gulch State Park just over the hill from the so-called "CONTROL" watershed of the South Fork of Caspar Creek, it is preposterous not to protect the old-growth and mature stands and trees in not only the South Fork of Caspar Creek, but in the whole Caspar Creek and Jughandle Creek watersheds as well. There must also be no more clearcutting/even-aged management in these watersheds to help make up for the disastrous out-of-control clearcut logging of the North Fork of Caspar Creek in the 1980s.

2. Also related to possible recovery of the Northern Spotted Owl and Marbled Murrelet in Mendocino County is the disturbing fact about the Recirculated Draft EIR that there is inadequate acreage for late-seral development. A couple key reasons I see related to this are that many of the trees in the mature stands under the Recirculated Draft for Jackson DSF will not be allowed to reach late-seral and old-growth stages. Clearly, the importance of old-growth and late-seral forest in the coast redwood region of Mendocino County to the Marbled Murrelet and other ancient forest-dependent species is not adequately considered in the Recirculated Draft Alternative G for the Jackson forest.

3. Areas with mature stands and mature trees should be removed from areas where clearcut/even-aged management variations are allowed under the Recirculated Draft's Alternative G. Though if some mature stands remain within the area where clearcut/even-aged logging is allowed under new Alternative G, then I call for two strict qualifiers. Those are:

   A. any even-aged management must be for important and scientifically valid research purposes; and

   B. there should be a strict maximum of 50 acres of mature stands (at Jackson DSF) which can undergo even-aged management in any 10-year period -- and these areas must not only meet the criteria under "A", but must not hurt watercourses, connectivity, or recovery chances for the Marbled Murrelet.

4. When considering what areas can undergo intensive management at Jackson DSF, consider the 100% probability (according to some biological researchers) that murrelets will be extent in Mendocino County by the middle of the 21st century.

Lastly, I am including slight variations of my more than 28 pages of comments on the Draft EIR for the Draft JACKSON Demonstration State Forest Management Plan. Unfortunately, most of my concerns from the old Alternative C1 also apply to new Alternative G from the Recirculated Draft for the Jackson forest.

SINCERELY,

Bruce Campbell
BRUCE CAMPBELL

February 24th, 2006 through July 12th, 2007

Bruce Campbell
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[redacted] Santa Monica, CA 90403

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

Re: Comments on Draft Environmental Impact Report for the Draft Jackson Demonstration State Forest Management Plan and on the Recirculated Draft EIR for the Draft Jackson D.S.F.M.P.

Dear Board of Forestry and to whom it may concern:

The Proposed Alternative known as C1 must be emphatically rejected because:

5 a substantial amount of Mature Trees can be logged (even including clearcutting variations in mature stands) under new H.G at Jackson DSF and [redacted] mature stands are a unique aesthetic resource that will become good habitat for old-growth dependent species -- *logging them would result in fragmentation and thus more edge effects, while it is likely that such logging will increase the amount of sediment in streams as well as raise the temperature of the watercourses which could imperil listed native salmonid species and amphibians;*

2. the document largely pretends that mature trees do not exist at Jackson DSF, and, to my knowledge, the Draft EIR for the Draft JDSF Management Plan never mentions the largest mature stands in coastal Mendocino County in the Brandon Gulch, nor the sizable mature stands at West Chamberlain Creek;

3. it hurts old-growth dependent species and makes it difficult for them to recover in the Mendocino County redwood region;

6 4. there is considerable wiggle room / leeway under C1 to log large and even old-growth residual trees; do you believe that there is such leeway under new Alternative G as well?

5. forest management focusing on removing older trees and stands to plant younger tree plantations is a fire hazard;

6. such intensive management activities are an aesthetic nightmare;

7. there is an inadequate road plan;

8. it would bring increased sedimentation of watercourses and increase their temperatures;

9. it would hurt rather than encourage recreational activities;

10. it would add toxic materials to land which also impacts watercourses and species;

11. the invasive plant control plan does not consider preventative measures;

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12. it hurts habitat for many species by removing too many snags; (pg. VII.6.6-121 admits that "some key habitat elements, such as snags, depending on their location, could be at risk." Page VI-35 admits that Alternative E would provide "vastly expanded opportunity for snag development".

13. it is too vague as to what the plans really are and there is no indication in the documents about the location to which one should send comments;

14. the Preferred Alternative C1 would count on commercial logging proceeds to supposedly carry out more ecosytem protection activities, though overall the ecosystem would be clearly better if the larger trees were left where they are, rather than exploiting them to feed bureaucratic pressures to expand activities. While new Alternative G has an improved principle in this regards, yet I am concerned that clearcutting variations at JDSF may fuel other clearcut variations with the theory and reality of so-called "forest health" getting lost in the shuffle.

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Related to the second point above, Page 4 of Appendix 4 in the Notice of Preparation shows this deception as to what age stands comprise the JDSF. It says that, "The majority of this area is now forested by young stands of redwood and Douglas-fir, but there are a few remnant stands of old growth forest." Excuse me, but is there anything in between? No mention of sizable mature stands. That same page says that, "Substantial core areas would be established to preserve old-growth forest stands and to provide for the development of late-seral habitat conditions." But, a total of 783 acres of late-seral habitat augmentation under Alternative C1 (allowing cutting quite a number of trees even in the buffer area around the small old-growth stands) split between various stands, along with the admittedly narrow riparian areas which have significant edge effects, in no way forms a biologically healthy "core" area in any conservation biology sense of the word. But, continued growth without timber-cutting disruptions in the sizable mature stands (along with nearby smaller ancient stands) can form important core habitat, but these mature stands must be protected rather than logged!

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I would like to point out that I found no mention in about 1500 pages in 3 volumes in regards to what address (or fax or e-mail) to which one should send comments on the Draft EIR for the JDSF Management Plan. This is entirely unacceptable, and this fact alone should necessitate the preparation of at least a Draft Supplemental document. In most such major (or minor) documents, such information is given often on the first or first few pages, or at least on the first or first few pages following the Table of Contents. Even better than a Draft Supplemental document would be, for this and a number of reasons, for the Board of Forestry should reject the whole Draft EIR and Draft Management Plan, and prepare thorough new draft documents with better alternatives, with it clearly stated where to send comments on those draft documents (through various modes), and with more updated specifics addressed -- some of these topics needing updating and specifics I will mention toward the end of these comments.

When I was seeking the Jackson documents a few weeks ago, I called the Board of Forestry who did not know where I should send it officially, but said I could order a CD of the documents. I did get an e-mail address and a fax number from an officeworker who was trying to be helpful, but these locations to send the comments were not the official ones -- and I know that some lawyers would be happy to not adequately respond to points raised in the draft if something was a little askew such as sending to an unofficial address. I was further appalled that I believe it was Mr. Gentry that called me back when I was insisting on a paper version of the documents, and informed me that it would cost $200 !!!!! Clearly, the state agencies are not interested in thorough public review of the documents (though at least the comment period was extended somewhat) and for this and some bogus claims in the document that many damaging activities are less than significant after

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mitigation, I do not believe the legal requirements have been met to adopt the plan -- let alone the
8 damaging alternative C or the damaging Alternative G unless there are severe restrictions on clearcutting variations including in mature new stands at JDSF.

Appendix 5 Page 21 says that JDSF in 1982 was 50,505 acres. Why is it now claimed to be 48,652 acres? What accounts for this serious discrepancy in acreage totals?

REJECT THE DRAFT EIR for the DRAFT JDSF MANAGEMENT PLAN

I urge outright rejection of the Draft EIR for the Draft JDSF Management Plan. One of its main faults is the logging of the vast majority of the oldest second-growth forest stands at Jackson. These 10,000 to 12,000 acres of valuable forest stands are very unique for the region, yet except for mentioning some mature stands toward the extreme western part of the forest (as well as some at Lower Big River) on a mere two pages of print (plus a map), the mature / older second-growth stands were barely mentioned in the lengthy documents -- clearly by design! Adding the acreage of the mature stands mentioned in the aforementioned areas at Jackson, it totalled about 3500 acres, a number which is likely a little less than a third of the mature stands left at Jackson DSF. Why not admit where the other mature stands are in the forest, and what the various alternatives offered would do as far as protecting or pillaging them? I note that page VI-19 says under Alternative F, "Approximately 12,000 acres that have not been entered in the past 80 years shall be managed to address the regional scarcity of that age class".

Other very serious problems with the Jackson documents are the plans for massive clearcutting -- with the amazing claim that with few exceptions 29% of the forest could be clearcut for "research purposes." There are other very damaging not quite clearcuts proposed in many other areas of the forest. There is also way too much wiggle room about how even old-growth residual trees may be logged if one determines that they do not have the proper structural characteristics, and I'm sure even more sizable mature trees even in the few areas mentioned for special treatment would be logged due to questionable excuses (with the prime reason to get the cut out to help the fund flow for the bureaucracy at JDSF). Other serious problems with the draft Jackson documents are the inadequate protection for stream temperatures which support native salmonid species, not paying adequate attention to accomodating recreational visitors in the northern and some other parts of the forest, and the proposed use of five identified and some unidentified herbicides (including even leaving the option open for aerial herbicide use). The other main problem with the documents were the inadequate alternatives. Surely, those who like the protective portions and working toward late seral stages in Alternative E would be champions for not just an aggressive inventory examining which of the 500 miles of roads should be decommissioned on the forest, but also would back funding the decommissioning of many roads at JDSF, as well as funding active stream restoration to improve native salmon and steelhead habitat. Though I do not believe that Alternative E or even F are being seriously considered as a possible choice to guide management at JDSF, yet at least Page VI-8 admits in regards to the 7 alternatives that, "These alternatives have been determined generally feasible, consistent with the basic project purpose, goals and objectives and consistent with the CEQA concept that alternatives avoid or lessen a project's environmental effects."
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PROPOSED HERBICIDE USE

I will start with the serious matter of herbicides, and will make short points / paragraphs often asking questions, so that the "response" won't put a number by a big paragraph and act like a simple sentence adequately answers a number of very serious complex questions.

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There is inadequate analysis and discussion about proposed herbicide (and other possible pesticide) use at JDSF in the Draft EIR / Draft Management Plan. Appendix 13 admits that, "These herbicide summaries are not intended to be exhaustive reviews of the herbicides that may be used at JDSF." That is an understatement!

1. Page VII.8-10 and 8-11 says that, "When management activity levels on the Forest increase following the implementation of the DFMP, herbicide use levels may increase above those of the past several years. However, it is not anticipated that herbicide use will increase to the levels of the early to mid 1990s." What were the herbicide use levels in the early to mid 1990s? What is the amount of anticipated annual herbicide use at JDSF? If another EIR / Management Plan mentions an anticipated level of herbicide use, is there anything preventing JDSF managers from ignoring that theoretical anticipated use level and applying more herbicides than stated?

2. It is so vague that no herbicide, herbicide formulation, herbicide combination, active ingredient, inert ingredient, or surfactant (be they currently approved, yet-to-be approved, or perhaps even banned herbicides) are forbidden from use at Jackson forest.

3. Even aerial application is not forbidden, due to this sentence likely written by a lawyer, "CDF does not anticipate any aerial application." (App. 13, page 1) Just because something is not anticipated does not mean it cannot be done unless specifically stated. Was the last sentence correct in this assumption(?), or will the next EIR / FMP forbid aerially spraying of herbicides at JDSF?

4. While admitting that CDF anticipates possible use of 5 proposed herbicides (plus an unknown number of current and future herbicides) "for invasive weed control and reforestation purposes", there is no indication how much (if any) might be used in bodies of water targetting aquatic plants or in riparian zones.

5. If 1500 pages can be spewed to justify essentially the same damaging stale plan halted by the court in mid-2003, surely you can present the basic "specific label and Material Safety Data Sheet" mentioned in the first sentence of the second paragraph of App. 13, page 1 in regards to herbicides proposed for use at JDSF.

6. How many of the 5 herbicides (or others being considered for use at Jackson) have had a complete set of Toxicological Profile tests completed and documented? Will you delay or ban use of such herbicides that do not have such a complete Toxicological Profile? If they are completed for certain herbicides, what results from the profile would prompt a decision to not use these materials?

7. What are the active ingredients, inert ingredients, surfactants, adjuvants, carriers, diluents, binders, dispersants, stabilizers, neutralizers, antifoamers, buffers, and degradation products for the 5 mentioned herbicides and for any other herbicide that may be used by CDF or worker at JDSF?

8. Will you allow the use of any herbicide at JDSF which was approved due to testing by Industrial Bio-Test which was a firm with a number of labs which had some executives jailed due to falsified, sloppy, and inaccurate chemical testing work?

9. Seeing that the majority of the pesticides in the western United States are sprayed / applied by Spanish-speaking workers, will all who might apply herbicides be able to read the warning label and Material Safety Data Sheet (whether or not the Toxicological Profile) in Spanish? Do such exist in Spanish in Mendocino County, in Sacramento, or beyond?

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10. Seeing that App. 13 page 1 says, "in the future, there may be additions or deletions to the list of herbicides considered for use at JDSF", then I'd like to propose deleting the 5 proposed herbicides and all others from consideration for use at JDSF.

11. Has it ever occurred to CDF / BOF that JDSF could be a demonstration center for non-chemical ways of controlling unwanted vegetation, and that you could partner with universities to develop innovative tools and other non-chemical alternatives, plus have unemployed forestry and other workers, youth, prisoners, and others assist with the task?

12. Has JDSF considered the fact that clearcut logging (and other severely disturbing logging practices) as well as related vehicular traffic (and otherwise) are the prime factors spreading invasive plants as well as lead to pioneer brush which chemical addicts determine need to be poisoned?

13. Will any studies regarding volatilization of herbicide residues (through brown-and-burn operations or due to wildfire following herbicide application) and might they have any effect on herbicide use decisions at Jackson?

14. Have the 5 herbicides, or any future use of other herbicides, consider studies relating to herbicides and formulations disrupting immune and/or hormonal systems, or in regards to their genetic, teratogenic, or fetotoxic effects?

15. I see no mention of likelihood of these 5 herbicides and others which may be used to reach groundwater (or their degradation products). Has CDF / BOF examined the studies or summaries about why contamination of groundwater resulted in the banning of Roundup / glyphosate in Denmark. (A couple articles on this matter are at <www.organicconsumers.org/foodsafety/glyphosate051503.cfm> <www.organicconsumers.org/ge/monsanto_roundup_banned.cfm>. I believe that due to very effect p.r. by Monsanto claiming that glyphosate biodegrades so quickly, that those testing groundwater for pesticides do not even consider testing for this widespread active ingredient whose formulation is always more toxic than the active ingredient glyphosate alone.

16. Might an herbicide which necessarily contains dioxin contaminants be considered for use at JDSF? Might any herbicide which sometimes contains 2,3,7,8 tetrachlorodibenzo-p-dioxin or 1,2,3,7,8-pentachlorodibenzo-p-dioxin be considered for use at Jackson forest?

17. Page VII.8-9 says, "In addition to pesticides, other regulated potentially hazardous materials that are anticipated to be used on JDSF include:" -- then the last bullet point says, "other pesticides, such as insecticides, fungicides, rodenticides (no use in DFMP)". So, other pesticides are "anticipated to be used on JDSF", yet it claims "no use in DFMP". This is bait-and-switch -- obviously written documents / CDs which is "the plan" does not entail use of such, but apparently on the ground use at JDSF is anticipated. Please clarify these contradictory claims.

18. Under "8.2 Regional and Project Setting for Hazardous Materials" on Page VII.8-10, it says that, "JDSF maintains a chemical storage facility, which contains herbicides, located near the Mendocino Woodlands Forest Fire Station (Personal communication, Walt Decker)." Is there anything besides herbicides and related spray equipment in this facility? Are there any herbicides / chemicals other than the 5 listed in the Draft EIR / DFMP in this chemical storage facility? Why

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was there no analysis of dangers from possible incidents regarding this, likely the largest concentration of toxic materials at JDSF? (By the way, the one sentence saying that there are requirements for "the transport, storage, handling, and disposal of the hazardous materials that might be used at JDSF are established and enforced by the NCRWQCB, Department of Pesticide Regulation, and County Agricultural Commissioner" means virtually nothing on the ground since these are generally office bureaucrats who have some written regulations on a computer or in a filing cabinet. The public wants to know what could happen in the real world on the ground (with some likelihood of impacting air and water pathways and living organisms, not some rosy theory that there is no need for concern since there are regulations. Will the herbicide storage matter be analyzed for the next EIR / DFMP at JDSF?

19. In regards to the Washington Toxics Coalition lawsuit which forced EPA to study the impact of 55 pesticides on salmon, I note on page VII.8-18 that, "As of June 30th, 2004, the EPA had reviewed over half of the 55 pesticides subject to this litigation." How did the 5 herbicides anticipated for use at JDSF in this Draft EIR / FMP fare in these studies? Please elaborate on EPA's findings pertaining to the herbicides which your documents listed as anticipated for use at JDSF.

20. Have you considered the impact on the aquatic food chain from the "eutrophication" effect of herbicides on waterways (whether applied onto aquatic plants or from herbicides washed into watercourses after being applied on land)? If so, please present these findings.

21. Clopyralid was banned for lawn uses in California in 2002 because of its persistence in compost. Would vegetation killed by clopyralid be burned or be hauled to a municipal dump or compost heap, or what would be the specific fate of this vegetation? (It is also been found to be "highly soluble in water" and is considered a "Hazard to Humans and Domestic Animals".

Page 4-91 of the Bureau of Land Management's Vegetation Treatment on BLM Lands in Western U.S. Draft Programmatic Environmental Review says, "Aquatic herbicides with the greatest likelihood of affecting special status amphibian species during normal application to an aquatic habitat are diquat and some formulations of glyphosate."

Excellent compilations of important points from studies regarding the impact of pesticides on salmon can be obtained from the Northwest Coalition for Alternatives to Pesticides based in Eugene, Oregon. The Executive Summary of the report Diminishing Returns: Salmon Decline and Pesticides can be found at <www.pesticide.org/salpestx.pdf>, while the Full Report can be found at <www.pesticide.org/salpest.pdf>. The report called Poisoned Waters (Protecting Pacific Salmon) can be found at <www.pesticide.org/PoisonedWaters.pdf>. Various articles on the subject are compiled at <www.pesticide.org/CleanWaterSalmon.html>. Please include these reports and articles, and research and give their references in your next EIR / FMP documents.

I am appalled by the wide range of uses of herbicides planned by William Baxter mentioned on Page VII.8-12 of the DEIR / DFMP, "Herbicide use may occur in the following situations:" "Controlling invasive species in order to maintain native plant communities, promote conifer habitat, and prevent the establishment and spread of new exotics." "Control roadside vegetation, primarily invasive species such as pampas grass, broom, and gorse that easily spread via roadways, but also native plant species that vigorously grow in these conditions and hamper road use and maintenance. *"For use, following broadcast burns and wildfires, to facilitate successful establishment and growth of planted conifer seedlings by reducing brush competition. * To inhibit

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the regrowth of hardwoods and maintain high conifer occupancy in harvest areas." Controlling Tasmanian blue gum infestation (plantation) at Caspar Creek watershed is also mentioned.

Virtually all excuses for use of herbicides is included in that quote, including reasons where one could make an argument to conduct aerial spraying of herbicides. One could spray all 500 miles of roadsides at JDSF. One can spray to kill invasive plants admittedly largely spread by the excessive road system. One can spray following wildfires and broadcast burns. And one can spray after logging to control brush and hardwood regrowth, and then again to assist conifer plantations by killing the so-called competition of brush and hardwoods which dare to try to maintain some botanical diversity on our publicly-owned state forest.

I will briefly touch on herbicides later in these comments when discussing fire dangers.

USE of OTHER CHEMICALS at JDSF

a. In relation to other hazardous material in those bullet points on pages VII.8-9 and 8-10, where are these materials stored at JDSF?

b. What substances comprise the "chemical treatments on Forest roads for dust abatement"? (Page VII.8-10). Are these analyzed in this Draft EIR / DFMP? Will they be analyzed in the next EIR / FMP? Are these the same or different chemicals as will be used as "chemical stabilizers" to control soil erosion? If different, of what materials do these chemical stabilizers consist?

The next EIR / FMP (be it another Draft, a Supplemental Draft, or the Final) must consider possible cumulative impacts of purposeful use and accidental spills and their impact on workers, recreational users (including children and pregnant women), specific sites, sensitive plants, aquatic areas, and the food chain in the watersheds at JDSF. Synergistic and cumulative effects from different herbicide formulations, and impacts of combinations of ingredients and breakdown products of different herbicides along with fire retardants (if used at JDSF), spilled fuel and other lubricants, and "proper" or improper use of "chemical soil stabilizers" and road dust-abating chemicals -- and their impacts on soil, watercourses, spawning gravels, groundwater, various listed and other sensitive species (and their food chain) must be carefully examined.

GENETICALLY MODIFIED TREES, GRASSES, and MULCH

1. Will the Board of Forestry or the California Department of Forestry plant, or allow to be planted, any genetically modified (using recombinant DNA technology to cross the trans-species barrier) trees, grasses, or other plants at JDSF? Seeing that there is an ordinance in Mendocino County prohibiting these crops, I hope such are not planned for Jackson. Also, I like that JDSF uses tree species from local genetic stock, which should preclude genetically modified trees, grasses, turf, and other plants from becoming an issue -- which should also make the likelihood of these threatening plants at Jackson a remote possibility.

2. Will land managers at Jackson take any steps to try to discourage mulch used at the forest from being from remnants of genetically modified crops? Will any of these steps also apply to the type of feed which horse and other riders may bring to JDSF to feed their horse or other animal? If the commercialization of genetically modified alfalfa goes through (which is being proposed in the past several months), could people bring genetically modified alfalfa to Jackson to feed their horses or other animals despite the likelihood of some seed escaping and taking hold on what is supposed to

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be a forest with just genetic stock vegetation (besides the invasive weed and eucalyptus problems)? (I will discuss mulch further when primarily discussing the impact of roads and management activities on the spread of invasive plant species at JDSF.
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I call for the rejection of the Draft Management Plan for JDSF due to the logging of the oldest second-growth mature forest stands (between 80 and 120 years old), due to plans for widespread clearcutting and other commercial logging, due to inadequate protection for streams from warmer temperatures and sedimentation which can harm or kill native salmonids, due to plans to use herbicides, and due to some other reasons enumerated above.

Also, there are no plans to accomodate more recreation in the area, while much of the mature forest at key current recreational sites such as Brandon Gulch and West Chamberlain Creek areas will be logged, while leaving just small "facade" buffer areas near trails and campgrounds -- and some logging can even occur within these "facade" buffer areas! I even object to the so-called management or treatment to achieve late seral forests in mature stands especially in the West Chamberlain and Brandon Gulch areas, as well as in the few areas identified as notable habitat proximate to marbled murrelets at the western side of Jackson forest (as well as at the Lower Big River mature stand). I note on page VIII-36 that 40.4% of the Brandon Gulch CWE assessment area and 21.6% of the Chamberlain CWE assessment area are on the chopping block within the next decade.

The best alternative presented is Alternative E which would manage the forest for a return to late-seral forest conditions. However, even that alternative is lacking because it does not allot funds for the decommissioning of hundreds of miles of roads which wreak havoc on stream habitat or the active restoration of salmon habitat in streams. Thus, the Proposed Alternative C1, and the Draft
9 JDSF plan in general, should be rejected as should new Alternative G unless there are severe restrictions on clearcutting variations.
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AESTHETICS

10 The Proposed Alternative C1 would substantially degrade the existing visual character and quality of many sites at Jackson Demonstration State Forest; as would new ALTERNATIVE G unless nearly all clearcutting and even-aged management is eliminated and what is carried out is not in mature or old-growth areas and is not adjacent to a state park and has a clear research purpose.

a. aesthetic mitigations under C1 are clearly inadequate -- not only is the 29% of the forest planned for clearcutting / even-aged management clearly not mitigatable, but other widespread commercial logging (including of mature stands) cannot be mitigated. Amazingly, on page VI-10, the Draft EIR has the nerve to say that in relation to Alt. C1, "With limited exception, clearcutting is permitted only for research purposes." Give it up! JDSF has had a massive amount of these so-called "experiments" already, and they are harmful aesthetically, to streamcourses and rivers, to aquatic and amphibian life, and to old-growth forest dependent species. And seeing that you mentioned it, what parts of the forest would be the "exceptions" where clearcutting would be allowed other than for "research purposes." Also, what precisely are the research purposes for the extensive clearcuts planned for the Berry Gulch watershed assessment area, as well as for other watershed assessment areas at Jackson forest?

b. Page VII.2-12 "Thresholds of Concern" points out that the proposed project would have a significant impact on aesthetics if it "substantially degrades the existing visual character or quality of the site and its surroundings" -- and mentions that the guidance as to what is considered significant is based on the California Environmental Quality Act (PRC Section 21001 and CEQA

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Guidelines). The documents act like one need not be concerned with aesthetics other than from a panoramic vista along a main road or trail. But, Webster's New World Dictionary 1975 defines "site" as "location or scene". There are many locations at JDSF, and most of these are not panoramic vistas (a number of which also show the scars form excessively intensive timber and road management activities).

c. It is wrong to have a Registered Professional Forester as the point person making determinations as to whether a certain management activity has a significant impact on aesthetics.

d. In relation to the Alternatives presented in the Draft Forest Management Plan, page VII.2-19 says, "Alternatives C2 through F contain more provisions than C1 for aesthetic considerations. Alternatives D through F include little or no clearcutting or other evenaged management and provide for greater levels of late seral forest development. These alternatives would have a less than significant impact on the visual character or quality of the site and its surroundings."

e. The terms "visual character" as well as "site and its surroundings" certainly include more areas than what one can see from a major road or trail at Jackson forest or near a state park or Special Concerns Area -- and even most of these buffers can have a certain amount of management activities / logging! (Thus, the Draft Forest Management Plan for Jackson acts like less intensive logging in buffer areas, as well as treating logging slash within 50 feet of major corridors, is sufficient to declare that "Timber harvests and related activities" would not "substantially degrade the existing visual character or quality" of the Special Treatment Areas and buffer areas, yet acts like there is no need to be concerned about visual impacts on the vast majority of our state forest.)

f. Page VII.2-18 admits that "comments made through the public Scoping process expressed the sentiment that the buffers were not necessarily sufficient to mitigate aesthetic impacts." Page VII.2-24 says that "The public scoping for this document clearly indicated a strong desire by some citizens and organizations for the State Forest to place increased importance on recreational and aesthetic resource values."

OVERLAP BETWEEN AESTHETICS and MATURE FORESTS at JDSF

Please note that AESTHETICS "d." above mentions the more aesthetically-pleasing alternatives and mentions the plus for aesthetics in providing "for greater levels of late seral forest development". Of course, not only is managing -- and sometimes non-managing -- for future late seral development helpful for aesthetics as well as for a number of species, but if a forest is currently mature, then it is clearly aesthetically pleasing. One doesn't need to log trees and leave stumps and slash around to try to accelerate some eventually pleasing aesthetics because the mature forest stands -- so rare especially in the Coast Ranges of central or southern Mendocino County -- are already aesthetically positive and will naturally become more so.

The following points are also related to the importance of the overlap of the importance of the mature forest stands at JDSF with the topic and legal requirement to not significantly impact the currently pleasant aesthetics in these stands:

, immediately following,

a. Pages VII.2-24 and 2-25 admit only that there is an aesthetic problem related to PG&E transmission lines which the State Forest has no control over, and claim that "all other visual cumulative impacts within the boundaries of the State Forest to be less than significant is supported by the following findings:". The third bullet point is "The State Forest maintains a high proportion

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of area devoted to continuous forest cover in managed stands of medium to large trees, and maintains the highest standing timber inventory of any large forest ownership in the coastal watersheds of Mendocino County." Since the eleven ancient groves (totalling 459 acres, and ranging from 5 to 101 acres in size) cannot be considered managed (except by nature), then this last quoted sentence must be referring to the 10,000 to 12,000 acres of mature forests (with a few scattered residual old-growth) at Jackson forest. (See the section on Mature Forests immediately following, because it is precisely the"medium to large trees" that allegedly make the current visual cumulative effects at Jackson "less than significant" which are the primary trees which are targetted for widespread logging as soon as JDSF managers can undertake it!)

b. The second bullet point in regards to criteria to help in determining whether physical changes significantly affect aesthetics on page VII.2-12 is "The integrity and uniqueness of the existing aesthetic resource." The first sentence under that point says that, "The magnitude of change necessary to create a significant impact to aesthetics is greater in a disturbed or non-unique environment than in a pristine or rare environment." (This also can apply to the Mature Forests section because substantial tracts of mature forests are comparatively pristine and extremely rare in coastal Mendocino County other than the 10,000 to12,000 acres at Jackson forest.)

c. I do like the admission on page VI-41 that under Alternative E, "Reduction in forest management activity expected to provide increase in aesthetic values."

MATURE FORESTS

Under "Scenic Attractiveness" on pages VII.2-3 and 2-4, it says that "Distinctive landscapes on JDSF with a high scenic attractiveness are:" -- the fifth bullet point is, "forested areas dominated by a high level of stocking of relatively large trees (The high levels of forest stocking and higher percentages of relatively mature timber stands, as compared to commercial industrial forest ownerships within Mendocino County, provide aesthetic values for forest visitors who desire to recreate or travel within JDSF)". (Clearly, this quote also applies to the Aesthetics topic.)

Page VI-8 says that, "JDSF is not typical of other large forestland holdings in its maturing second-growth timber conditions, its ongoing research activities such as the Caspar Creek Study, its old growth redwood and Douglas-fir groves, and its special facilities such as conservation camps."

In relation to relatively rare habitat types and a forested mosaic, page V-11 says, "Maintaining a forest mosaic that helps support the many species in the region is a goal for both forest management and private forest demonstration. Habitat protection and restoration of relatively rare habitat types is also an important element of forest management." Clearly, old-growth forests which are predominately redwood, some residual old-growth with mature redwood forest, and also mature redwood forests are all "relatively rare habitat types". That same page mentions that, "It can be assumed that most of the redwood forest in this region was once dominated by old-growth".
moderately intensive
For the Proposed Alternative C1 (under "Forest Management Special Concern Areas and Woodlands Special Treatment Areas) on page VI-20, it says that only 780 acres at JDSF is devoted to "old-growth augmentation (late seral development)". This is clearly inadequate to protect this relatively rare habitat type, while even what JDSF managers may declare timber harvest for habitat restoration may well look like at least moderately intensive forest management which other than in young plantation areas would look to recreationists as well as some old-growth dependent species like you were eliminating canopy and sizable trees which can serve as murrelet social activity

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habitat and work into at least marginal nesting habitat within several decades. Not that I support even what this plan purports to be management to achieve late seral forest stage especially in the older and larger mature stands, but your denial of the importance of the mature stands even to the point of not proposing at least lighter thinning in those areas is appalling and biologically ignorant as well as an aesthetic disgrace from the perspective of recreationists.

It is quite disturbing to read on page VII.2-15 that, "Even-aged prescriptions are proposed in the central and eastern portions of the JDSF". It is also disturbing that such a high percentage of Berry Gulch, which is adjacent to the Mendocino Woodlands area and the Lower Big River mature stands the document discusses the importance of when discussing the marbled murrelet, is scheduled not only for logging, but for clearcutting / evenaged management.

WESTERN PART of JACKSON FOREST

Despite the stupidity of having a special "clearcutting experiment" on the Caspar Creek watershed in the latitudinal middle of the western portion of the Jackson forest (and the existence of a eucalyptus plantation in the area), still this portion of JDSF is quite important. In the western portion, MANAGEMENT ACTIVITIES SHOULD BE MINIMIZED and recreation should not be encouraged because:

a. rare plants at Jackson are especially concentrated here -- these include: Pygmy Cypress, Pygmy Manzanita, Leafy-Stemmed Mitrewort, Bolander's Beach Pine, Swamp Harebell, Coast Lily, and California Sedge.

b. some mature forests exist here (plus some old-growth residuals are in the Russian Gulch watershed in the state forest, besides more substantial old-growth groves in the state park further west);

c. the special clearcutting area at Caspar Creek has already caused enough damage in the west, and apparently this area cannot be guided by the managment plan;

d. there should only be an increase in campgrounds in this area if some campgrounds at adjoining state park land are closed to try to avoid disturbing marbled murrelet nests nearby -- and if campgrounds are located, JDSF personnel should educate campers not to leave food scraps which attract corvid bird species which also consumes marbled murrelet chicks and eggs.

Management activities such as logging should be minimized in the western portion (as well as in Lower Big River, Brandon Gulch, West Chamberlain Creek watershed, east side of mainstem of Chamberlain Creek, and other areas), while road-related activities should generally pertain to decommissioning damaging and unneeded roads. I object to the intensive nature of JDSF's so-called "management for late seral forest", and definitely object to more logging activities in these mostly mature stands adjacent to state parks before the specific assessment of habitat for the marbled murrelet is completed. Off-road vehicles must be halted from damaging riparian and other areas, plus should be controlled to stop the spread of invasive plants and so as not to run over and damage the aforementioned rare plant species which especially favor the western part of the Jackson forest. And due to this area being adjacent to murrelet nesting habitat (while hopefully being allowed to mature further to accomodate some murrelet nests in the future), hunting must be prohibited at least in this part of JDSF.

COAST REDWOOD ECOSYSTEM and MARBLED MURRELET RECOVERY

The draft documents try to downplay the role which Jackson Demonstration State Forest can play in recovering old-growth forest dependent species. This area is quite vital due to it being the largest contiguous publicly-owned land in coastal Mendocino County -- a county and part of the county devastated by corporate timberland clearcutting. Also, the 459 acres of unentered or residual old-growth areas are a start, and the 10,000 to12,000
acres of mature forests are quite unique in the county and vital for recovery of watersheds and various species in this region.

Page V-12 of the Draft JDSF Management Plan says, "JDSF and the surrounding forestland area provides habitat for a number of listed and sensitive fish and wildlife species, including the Northern Spotted Owl, coho salmon, and steelhead. In addition, JDSF currently provides or may provide in the future, habitat for several listed or sensitive species that are not currently known to occur on the forest. These species include the Marbled Murrelet, Pacific fisher, and Humboldt marten. As such, the large block of publicly owned forestland that is JDSF, in conjunction with other parcels of public land in central Mendocino County, represents a valuable resource of potential reoccupancy and sustainability for at-risk wildlife species."

On a disturbing note which should mobilize us (and managers at JDSF and overseers at BOF) to action is that the 5-Year Murrelet Status review (McShane et al. 2004) assessed the status and trends of Marbled Murrelet populations within each of U.S. Fish and Wildlife Service's 6 Recovery Zones. Page VII-6.6-74 says, "The Zone Model projected an extirpation probability of 100% within 40 years for Recovery Zones 5 and 6 with a 2% annual migration rate into the zone." That means that murrelets will be entirely gone from the Humboldt / Mendocino County line all the way down to the southern extent of their habitat in Monterey County by the year 2044!

We need the agency managing the largest publicly-owned contiguous block of land in coastal Mendocino County to step up to the plate big-time, and do all that they can to provide extensive habitat for the Marbled Murrelet (and other old-growth forest dependent species). So-called mitigations to help murrelet habitat under the plan are a dismal sham when they plan to log the bulk of mature trees at JDSF within the next five to ten years. The marbled murrelet, which is federally-listed as threatened and state-listed as endangered, needs our help immediately (or even sooner!). A decent start at this late date would be to emphatically reject the Jackson Demonstration State Forest Management Plan.

I noticed on pages VI-5 and VI-6 that rejected from consideration as an alternative was a "Regional Watershed and Conservation Planning" approach using JDSF as a "mitigation bank" or "mitigation site" for wildlife connectivity partly with other public lands in the county. While it makes sense to dismiss this as an alternative because it may be difficult to mandate participation of neighboring timber companies (though it makes some sense for neighbors developing Habitat Conservation Plans to work with this approach), yet it is incredibly logical biologically. It is disingenuous to say that, "The use of JDSF as a mitigation site could allow more intense timber management activities elsewhere likely resulting in a full range of significant indirect impacts that would not otherwise occur as a result of this project." Just because you are obsessed with board-feet does not mean that if you take better care of a certain area, that it would necessitate more-than-planned intensive timber activities (beyond what was already planned) elsewhere in the watershed having significant indirect effects. Using that so-called logic, why protect any forest area since people will get just forest products from somewhere else? You mention regarding the

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aforementioned suggested alternative which you dismiss as not needing analysis that, "Components of this alternative have been incorporated into Alternatives C2, D, E and F to the extent that they meet the project purpose, goals and objectives, and reduce environmental impacts." This indicates that the Proposed Alternative C1 does not consider and incorporate into it the regional significance which the JDSF area could play in regional wildlife connectivity and as a prime area for recovery of habitat for old-growth redwood ecosystem dependent species, while new Alternative G with its emphasis on clearcutting and even-aged management clearly is not concerned about species recovery or regional wildlife connectivity seeing that the massive fragmentation that would be perpetrated under new AG G would not assist recovery or connectivity.

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So, on the one hand you dismiss the role of Jackson as a possible key recovery area for old-growth dependent species in the watershed and regional setting, yet on the other hand you use portions of somewhat "coarse" studies to act like the Jackson area is not in the highest priorities for restoration as far as redwood ecosystem conservation. If you are going to use extrapolations from Strittholt's "coarse" work and snippets from other studies to argue that the JDSF area is not vital for recovery of the coast redwood ecosystem, you cannot simultaneously argue that it is beyond your scope to analyze JDSF as a key component in watershed and regional recovery habitat for the redwood ecosystem and for a number of species dependent upon it.

I note that Page V-1 says that, "About half of the total area of redwood forest is located to the north of JDSF and about half to the south. With 542,000 acres of redwood forest, Mendocino County encompasses more redwood forest area than any other county in California (Fire and Resource Assessment Program 2002)." This fact that Jackson has similar amounts of redwood ecosystem to its north and to its south, and the fact that the Jackson DSF is the largest contiguous publicly-owned acreage in coastal Mendocino County, should give one a hint about how significant a role this area could play in "demonstrating" that we should care about managing this vital area to help in watershed, regional, and ecosystem recovery for the health of its watersheds and to prevent extirpation of species (for instance) from murrelet Recovery Zone 5. But since you do not seem to take watershed, regional, or ecosystem conservation and recovery seriously, I do not believe your statement on page V-11 that, "Habitat protection and restoration of relatively rare habitat types is also an important element of forest management." This EIR / FMP admits that there would be substantial edge effects in the streamside buffer areas -- thus they could certainly not develop to be anything but very marginal murrelet nesting habitat even centuries from now.

Need I remind you all that murrelets have been spotted near or in JDSF by such folks as Cota and Papke (1994), Ralph et al. (1994), Georgia-Pacific Sustained Yield Plan (G-P 1997), Camp Three Timber Harvest Plan (Jameson 1999), M. Jameson (personal communication 2002), and by others reporting sightings or giving interviews about such. Page VII.6.6-54 says that there are indications that "murrelets are likely nesting in Mendocino County and in the vicinity of JDSF (K. Nelson pers. comm. March 11, 2004)."

MARBLED MURRELET BIOLOGY

Here are some key quotes about the murrelet from the document. Though they are in the EIR / FMP, it does not seem like many of these points were considered in the development of the proposed alternative's management activities at Jackson. Page 6.6-53 says, "Current breeding populations are discontinuous and generally concentrated at sea in areas adjacent to remaining late-successional coniferous forests near the coast (Nelson, 1997a)." "A 300-mile gap occurs in the southern portion of the marbled murrelet's breeding range, between Humboldt and Del Norte Counties in the north and San Mateo and Santa Cruz Counties in the south. Marbled murrelets likely occurred in this gap prior to extensive logging of redwood forests (USFWS, 1997ac). Moderate numbers of murrelets have been observed along the coast of Mendocino, Sonoma, and

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Marin counties (Paton & Ralph 1988, 1990)." I would say that the term ":moderate" is optimistic here. Page 6.6-73 says, "A major gap in the at-sea distribution of murrelets is found between Humboldt and San Mateo Counties. Murrelets have recently been found to breed in small patches of nesting habitat still extant in Mendocino County. A moderate to low density (1.8 - 3.9 birds per square mile) was recorded from Loleta, Humboldt County to Albion, Mendocino County to Half Moon Bay in San Mateo County."

Page 6-75 says, "According to Ralph and Miller (1995), the most important factor in indicating occupied stands was density of old-growth canopy cover. Occupied stands had a greater percentage of old-growth canopy cover than stands with only murrelet presence or no detections (Ralph and Miller 1995)."

One key point from my 17 years of research regarding the marbled murrelet which I did not see mentioned in the Jackson Draft EIR / FMP is that to successfully nest in California, murrelets need not only to be on a large mossy horizontal conifer branch (which need not necessarily be redwood), but also need ancient redwood canopy above the nest in order to help protect them from the gaze of corvid bird species. It is admitted on page 6-75 that, "Nests were typically located in the top third of the dominant tree canopy layer and usually had good overhead protection. Such locations seem to allow easy access to the exterior of the forest and provide shelter from potential predators." Yet, this does not admit what some key researchers believe to be biological fact in California, which is that murrelets need old-growth REDWOOD canopy above their nest to have a chance for nesting success. Thus, the sentence on page VII.6.6-75 telling of Ralph and Miller's findings that "the most important factor in indicating occupied stands was density of old-growth canopy cover" -- in California, that should be clarified to say "old-growth redwood canopy cover". I note that page VII.6.6-168 under "Alternative C1 Project Alternative --Inside JDSF" says, "model outputs for Alternative C1 within JDSF indicate a decrease in acreage of large size and multistoried canopy condition in Redwood (RDW6)" -- thus even the most classic ancient forest type will have a canopy reduction which hurts species dependent upon interior forest conditions with mostly closed canopy. Page VII.6.6-170 in regards to habitat changes within the first period (2004 through 2030), says that, "Potential Marbled Murrelet habitat capability is expected to decline in the first period (-7%) given reduction in extent of Redwood 6." This is unacceptable in an era where murrelets may be facing extirpation from Zone 5 and possibly Zone 6 as well!

Page 6-76, in reference to studies by Meyer (1999) and fide Raphael et al.(2002), "In that study, patch size and isolation were important attributes of sites occupied by murrelets; at a broader scale, proximity of habitat patches to each other and amount of habitat in the largest patch predicted murrelet densities in adjacent offshore areas." Thus, since mature forests are at least half way there to being old-growth, and seeing that there are substantial mature stands especially at Brandon Gulch CWE assessment area, in part of Chamberlain CWE, and elsewhere, these stands should remain intact which could develop into at least as good a murrelet habitat area as those nearer the coast mature stands which unfortunately are facing excessive timber management ironically in the name of "late seral" development. The sizable mature stands especially adjacent to ancient stands are especially important, and the proposed alternative's plan for timber activities even within so-called buffers near old-growth areas does not help the recovery of old-growth dependent species. McShane et al. 2004 concluded that (pg. VII.6.6-77), "Increased levels of nest site predation as a result of forest fragmentation and increased amounts of edge are considered the most significant cause of nest failure (corvids being the principal predator)."

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I did find it interesting that a study in Washington state concluded that, since there is somewhat more uniformity in a mature stand than in a multi-layer ancient stand, when mature stands meet ancient stands or aggregations (as in the Brandon Gulch and Chamberlain cumulative watershed effects assessment areas as well as at mature stands at the western part of Jackson adjacent to state parks which contain ancient forest elements), that it is superior murrelet nesting habitat since these areas would tend to have less corvids (unless recreationists in the state parks leave considerable food scraps around anyway). Here is most of that interesting paragraph, "General landscape condition may influence the degree to which Marbled Murrelets nest in an area. In Washington, detections of murrelets increased when old-growth/mature forests comprised more than 30% of the landscape. Raphael et al. (1995) found that the percentage of old-growth forest and large sawtimber was significantly greater within 0.5 miles of sites that were occupied by murrelets than at sites where they were not detected. Raphael et al. (1995) suggested sites with 35 percent old-growth and large sawtimber in the landscape are more likely to be occupied. However, Raphael et al. (2002) found that murrelet numbers on the Olympic Peninsula, Washington, increased as the amount of core area of late-seral forest and proximity of patches increased, and decreased with increasing amounts of edge of late-seral patches." Thus, rather than log nearly all of the mature trees which comprise about 20-24% of JDSF -- which sometimes are adjacent to the scatterings of old-growth groves which are almost 1% of the Jackson acreage, let that substantial amount of sawtimber remain vertical and allow other areas to grow larger trees as well so that the percentage of good-sized trees in good-sized patches can be over 25% and climb from there. In the Meyer (1999) and fide Raphael et al. 2002 studies regarding murrelet habitat in California, page VII.6.6-76 explains that, "proximity of habitat patches to each other and amount of habitat in the largest patch predicted murrelet densities in adjacent offshore areas." Thus, protect especially the substantial patches of mature trees which are of extra value if adjacent or in relative proximity to remaining old-growth stands and residual, partially to reduce the number of avian nest predators on murrelet chicks and eggs as will be elaborated upon in the following paragraph.

On a similar note, Page VII.6.6-77 discusses the findings of Marzloff et al. (2000) by saying, "In their study area (western side of the Olympic peninsula of Washington State) providing landscapes that include mixtures of simple-structured mature, mature forest, and old-growth forest likely to be occupied by murrelets could increase nest success and productivity relative to landscapes of pure old-growth because those portions of the landscape with mature stands of relatively simpler structure would hold fewer avian nest predators."

I find it disturbing that page VII.6.6-83 says that, "Outside of stochastic events like the Biscuit fire, the greatest loss of suitable habitat is attributed to consultations on individual harvest units, individual trees, and suitable habitat harvest through Habitat Conservation Plans (McShane et al. 2004)." Thus, this shows that the wildlife agencies are not serious about protecting murrelet habitat (let alone the forest managers) even in areas that have been declared "critical habitat" for the federally-threatened and state-endangered marbled murrelet. Not only do biologists need to do more than token consultation and perhaps suggest a minor mitigation modification for habitat, but they and others need to realize that where you have both designated critical habitat as well as a large contiguous publicly-owned forest in a region which has largely had its older trees butchered, it is time to get serious about providing substantial areas for murrelet recovery -- and what better an area than one with substantial mature stands (sometimes adjoining ancient remnants and groves) on publicly-owned land designated critical habitat in the heart of the redwood region not only of Mendocino County, but of California as well.

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The Jackson management plan cannot have it both ways. Page VII.6.6-127 says that, "Marbled Murrelet habitat value within current old-growth groves on JDSF and late seral forest conditions associated with WLPZs are discounted under the DFMP due to distance from the coast reduced likelihood of certain nest site conditions given that distance and in the case of the latter, increased edge effect and potential for nest site predation." So, the near-term plans are to do intensive logging of mature stands especially where there are most extensive (and which also adjoin some ancient stands like at Brandon and Chamberlain areas), yet it is admitted that "increased edge effect and potential for nest site predation" are problems. Substantial mature forests are becoming murrelet social activity and flyway areas and will become at least marginal murrelet nesting habitat within several decades, so do not log them which would ruin chances for future nesting habitat in the mature stands and which would make any murrelets who may wish to attempt nesting at the ancient stands in these area be more prone to edge effects including corvid predation! The aforementioned page continues, "Harvest of certain forest conditions under the DFMP could reduce the effective future recruitment of potential Marbled Murrelet habitat that by virtue of its location would have a higher probability of occupancy." Thus, both the mature stands adjacent to state park and Mendocino Woodlands areas, and the sizable mature stands at Brandon and West Chamberlain areas, should not only be logged en masse as is planned for nearly all of the larger mature stands, but also should not have substantial treatment to allegedly achieve late seral characterisitics because taking over half of the sizable trees out (which would not occur in more considerate practices of late seral stage development, for instance by the Institute for Sustainable Forestry or by a landowner at Deer Creek, Josephine County, OR) would also increase edge effect and predation of murrelet nests.

Thus, it is preposterous to make the claim (obviously urged by lawyers rather than reputable biologists) on page VII.6.6-121 that "Substantial adverse effect, either directly or through habitat modifications" of sensitive species, or "Reduce the number or restrict the range of a rare or endangered animal" is claimed to be "Less than Significant with Mitigation". Some generic impacts from management activities which do not kill a species outright but which impact their habitat is mentioned on pages VII.6.6-122 (and 123), "Indirect impacts may include, but are not limited to, the reduction of suitable nesting habitat or nest sites, habitat connectivity and dispersal corridors, canopy cover, and key habitat elements (hardwoods, snags, LWD, and trees with cavities). Many of these impacts affect habitat quality and/or suitability and, ultimately, can adversely affect reproduction and the continued persistence of a species in a given area." Obviously, the writer of the following sentence conveniently overlooked the fact that JDSF contains the most substantial mature forests in coastal Mendocino County (which is a "rare habitat" in the region and will become another rare habitat within decades -- an old-growth habitat), "The proposed action does not propose the modification or removal of rare habitats." I believe that the Proposed Alternative calls for wholesale removal of the rare mature forest habitat with the potential to be the largest block eventually supporting marbled murrelet nesting in Mendocino County.

Though some elements of the Interior Dept. are now claiming that one need not list the murrelet in California, Oregon, and Washington because there are plenty of murrelets in Alaska, is ignoring info such as is mentioned by McShane et al. 2004 and others about not only different genetics among murrelets south of Alaska, but even the difference in murrelet genetics in different recovery zones in California: "Loss of Genetic Variation Among Populations. Given that there are at least 3 genetically distinct populations of Marbled Murrelets, loss of any of these populations would reduce the species' genetic resources and compromise its long-term viability." "The probability for extirpation is especially prominent for Marbled Murrelets in Zones 5 and 6." In regards to the greater murrelet range, page VII.6.6-86 says, "Estimates of the distribution of neutral genetic variation in Marbled Murrelets indicate that population loss in California, British

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Columbia/mainland Alaska, or the Aleutians would however compromise long-term viability of the species and adaptive variation."

Page VII.6.6-89 says, "JDSF was included in the critical habitat designation (USFWS 1996b). Criteria for critical habitat include the presence of suitable nesting habitat, presence of murrelets, and proximity to foraging habitat. Critical habitat also was designated in zones of current low use by murrelets. These areas are intended to support the USFWS goal to reduce gaps in the species nesting distribution, and help buffer the species from future catastrophic events such as oil spills and forest fires. JDSF is the largest contiguous parcel of public land on the Mendocino County coast. In California, 175,000 acres (71,040 ha) of state lands were designated as critical habitat, of which JDSF constitutes about 29 percent." "Jackson Demonstration State Forest falls within the Mendocino Zone (Zone 5) that extends from the southern boundary of Humboldt County California, to the mouth of San Francisco Bay." This zone extends from 1.2 miles at sea to up to 25 miles inland. "Conservation measures here could still benefit the species. Murrelets along the coast of Mendocino, Sonoma and Marin Counties are considered important to future reconnection of murrelet populations in northern and central California. Recovery efforts in Zone 5 may improve survival and recovery in adjacent zones by reducing the current geographical gap in breeding distribution. Given that the population of murrelets in this zone is so small, longer-term recovery efforts geared toward the development of new habitat may be most important (USFWS 1997)." However, this does not mean that what is now suitable social activity and marginal nesting habitat for the murrelet should be exposed to greater edge effects and corvid predation due to the intensive
12 management activities proposed under Alternative C1 and new Alternative G simply because of claims that buffer strips and riparian areas will have some old-growth over a century from now. Substantial chunks of good habitat are needed, and the best chance for this is to protect the mature stands at JDSF, especially when they are larger and when they are bordering ancient stands either at JDSF or in adjacent state parks or the Mendocino Woodlands area.

I notice that page VII.6.6-89 mentions "actions that will contribute to population stabilization and eventual recovery of the species" which could be "potentially implemented at JDSF" -- point #2 is "provide for the maintenance and recruitment of suitable, high-quality habitat over the long-term (50-100 years)". Seeking to have young-growth grow to be old-growth murrelet habitat just will not happen in that length of time. But if the JDSF mature stands are protected, they will provide good social activity and flyway habitat in the very near future, and will provide at least marginal nesting habitat in the length of time where some studies conclude the murrelet will be extirpated from south of the Humboldt County line -- extirpation predicted to be 100% by 2044 in Zones 5 and 6. Thus, protect the mature stands to provide just enough habitat for the murrelet to possibly survive in the recovery zone until the middle of the century, and keep protecting the mature stands so that it can provide good murrelet nesting habitat by late this century.

MURRELET, MENDOCINO COUNTY, and REDWOOD ECOSYSTEM RECOVERY including addressing the "coarse" STRITTHOLT Study

Some areas of Mendocino (with a couple in northwestern Sonoma County) in which murrelets have been detected in recent years include Ten Mile Creek, Big River, Navarro River, Chadbourne Gulch, Usal Creek, Russian Gulch State Park, Alder Creek, Admiral Standley Park, Greenwood Creek, Gualala River, Garcia River, Albion River, Hardy Creek, Wheatfield Creek, Haupt Creek, Willow Creek, Digger Creek, and at the Wages Creek and Rider Gulch confluence. (An earlier paragraph told of murrelet sightings in the vicinity of JDSF.)

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In 1999, Strittholt et al. came out with an admittedly "coarse" overview of relative conservation values for watersheds in the North Coast redwood ecosystem. There was a general map called figure VII.6.6.5A. on Page VII.6.6-27 which was the "Composite Model Ranking by Watershed Using Criteria Two Through Nine". Though the map should have been considerably larger and the names of rivers and creeks should have been listed, I used my California atlas and the shape of the coast to determine which river watersheds were which shade on that map. The Noyo River as a whole looks like it is given a "medium" conservation value. I believe that both Big River and the short coastal watersheds which run from JDSF through state parks to the ocean (as well as Ten Mile Creek watershed to the north of the Noyo) were given High conservation value potential.

Looking on Page V-28 at "Table V.4. Strittholt et al. (1999) Redwood Ecosystem Conservation Ratings for JDSF Cumulative Effects Assessment Area", it gets into more detail. Three of the four coastal drainages, as well as the Mouth of Big River, were the areas at least partially on the Jackson forest rated of High Conservation Value. In regards to the CWE assessment areas that have substantial acreage at JDSF, I note that 4 of the 5 CWE assessment areas scheduled to have the most intensive timber management activities over the next five to ten years are rated of Medium conservation value. Yet, these watershed assessment areas (Brandon Gulch 40.4%, Kass Creek 35.2%, Berry Gulch 23.8%, Chamberlain 21.6%, and Parlin Creek 17.9%) are planned for the most intensive logging at JDSF in the near future. Except for smaller coastal drainages and the Mouth of Big River, as well as 4 of the 5 just-mentioned watershed assessment areas, almost all the rest of the conservation value for JDSF is rated low. Why is JDSF itching to conduct timber management activities in the very near future which would ruin the redwood ecosystem conservation and recovery values? The one of the 5 mentioned watersheds which did not have a medium rating was Chamberlain Creek, however it has substantial mature stands on its western fork, and must not be hammered so that there would be close to no connectivity (with the exception of inadequate riparian buffers which could still have logging within them). So, besides being surprised at the rating for Chamberlain area, I'm not too surprised by the other ratings when one considers that it was based on GIS photography which is focusing on age and species of tree stands rather than focusing on maintaining watercourses so that they are not excessively sedimented which can ruin chances for reproductive success by native fish species. Likewise, clearly stream temperature needed to support Coho salmon as well as steelhead trout was not considered by Strittholt et al.

Before I relate the Stittholt redwood ecosystem conservation value criteria to JDSF, I will comment on the first and the tenth criteria. The first was given, but was ignored in the modelling and assigning of conservation values of watershed areas. That first criteria is "Patch size of late successional forest". While technical definitions would only include the ancient stands at JDSF none of which is over 101 acres, but Strittholt's calculations did not consider the considerable mature forests at JDSF which could develop within several decades to marginal habitat for ancient forest dependent species, and could be full-fledged old-growth habitat within a century. No other area can come close to the many thousands of acres of mature mostly redwood forest adjoining small ancient stands -- at least south of Humboldt Redwoods State Park. Thus, if relatively near future late-successional patch size at JDSF (depending upon management) could combine with the realization that JDSF is the largest contiguous publicly-owned redwood ecosystem land in Mendocino County, clearly JDSF would look rosier in terms of conservation value for the redwood ecosystem to Strittholt and others. Regarding the tenth criteria, it says on Page VII.6.6-26. "A tenth criterion addressing management potential was not modeled but qualitatively included to evaluate institutional barriers to management." What does that mean? Does it mean it examines the obstinance or bottom line of companies and management agencies to see whether practices are

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likely to change to allow more conservation? Does it mean that there are institutional barriers among companies and management agencies which precludes management (or non-management) which would protect or work toward late-seral characteristics? Of course, bear in mind that many of the most prime areas for conservation of the coast redwood ecosystem are natural and thus not managed by humans, and should not be managed -- though possibly some very light management in the greater area / buffer area of older or mature stands to assist recovery of the area to provide better habitat for old-growth dependent species. The BLM's Arcata office is doing well at such work in the Headwaters Preserve area, and they are not oriented toward cutting big trees and taking out the majority of large trees in a so-called buffer as are forest managers at JDSF.

Before I get into those 8 criteria which were listed and used to determine conservation value of watershed areas, I will point out that Strittholt's work was mentioned as "coarse", thus not having much detail. Did you consult any other groups (besides the few words mentioning BLM and Save-the-Redwoods League) about prime areas within which one could conserve, restore, and recover the priceless coast redwood ecosystem? Not long before finishing these comments, it occurred to me that Legacy - The Landscape Connection group did detailed GIS and other work in regards to the North Coast redwood ecosystem. They were unable to get back to me before I completed this paper, but their phone number, for future reference and to hopefully include some of their material in the next EIR / FMP is (707)826-9408.

In regards to Strittholt's Criteria 2 through 9, it is true that the road density currently at both JDSF and neighboring timberlands is out of control -- while the Alternative C1 proposes more roads and is very vague as to how many roads will be decommissioned, so it is important to choose Alternative E or F in regards to roads while being sure to fund their substantial decommissioning work in the very near future. There are some threatened and endangered species at Jackson, so do not let the watercourses receive more sediment or have their temperature raised, so that native fish can still survive in many of Jackson's streams and allow the mature stands to become old-growth habitat to host species such as murrelets and NSOs which are currently not very common at JDSF. The "Concentration of late successional patches" criteria should be examined in regards to what I mentioned under Criteria 1 about if one protects mature stands and lets that become ancient, that could become excellent future habitat for old-growth dependent species. Forest age composition I basically just covered, but unfortunately JDSF and the nearby timberlands have predominately young-growth -- which makes the substantial mature with a little ancient at JDSF more unique and important. Forest fragmentation is certainly a problem, thus do not fragment the mature stands bringing more edge effect to ancient stands at JDSF, and do not carry out widespread clearcutting as scheduled under Alternative C1 or under new Alternative G. Even the JDSF areas with some decent mature elements near the state parks to the west are not well-managed (regarding criteria 7). There are too many road and stream interactions at Jackson (partly due to Hwy. 20), though it does divide areas of the state forest where recreation should not be promoted toward the western reach of the forest, from the campgrounds, recreation corridors, and mature/ancient stands in the Brandon Gulch, West Chamberlain, and other areas. For criteria 9, while there are some regulations promulgated regarding riparian corridors at JDSF, they would allow too much logging of all but the ten larger conifers in a stretch of more than a football field, plus logging too much hardwood in places. These areas are not wide enough under the proposed alternative for Jackson to make edge effects negligible. However, some mature stands along the North Fork of the South Fork of the Noyo River, at West Chamberlain Creek, plus some toward the western part of the forest as well as a little of James Creek to the east do have some decent forest nearby streams.

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19.

The 3 regions related to Strittholt's GIS work do not make much sense. Both the northern and central regions for redwood ecosystem conservation value in California include parts of southern Humboldt County, while both the central and southern portions include parts of northern Santa Cruz County. Seeing that redwood parks (besides narrow strips along the coast in northern Humboldt and Del Norte Counties) of substantial size are concentrated in southern Humboldt and in northern Santa Cruz County, watersheds partly within or adjacent to the major parks such as Humboldt Redwoods State Park and Big Basin Redwoods State Park help to skew the findings not in the favor of ecosystem recovery at Jackson and Mendocino County as priorities. Because only little state parks to the west are protected in the Jackson vicinity, and because most redwood state parks are so small in Mendocino County, only the little larger protected area at Little River made enough of an impression to get Strittholt to rate the Little River watershed and the neighboring Albion River watershed to the south as having a "Very High" redwood ecosystem conservation value in Mendocino County.

Page V-29 mentions the Save-the-Redwoods League and BLM report of 2001 which followed workshops about areas especially needing conservation in the redwood zone. Of the eleven focus areas, none involved watersheds within or adjacent to the CWE assessment areas of JDSF. It should be noted that historically SRL, besides purchasing some substantial acreage temporarily to be handed over to state or federal park managers, has been focusing on acquiring acreage to enlarge current parks. Since that 2001 report however, they have turned more attention to key biological connectivity corridors, both in the Redwoods-to-the-Sea / Gilham Butte area of southern Humboldt County, and more recently the considerable cutover lands in the Mill Creek area which link the Smith River Nat'l Recreational Area with the coastal redwood parks in Del Norte County. I'm sure all or close to all areas discussed were private land areas which some felt should come into the public realm (or at least have good conservation easements), and thus did not focus on the one large contiguous publicly-owned land in the heart of the redwood region -- that being JDSF.

Let us look at murrelet sightings and potential for recovery in Mendocino County, while keeping in mind the Stittholt map on Page VII.6.6-27. A few things should occur to one when looking at the shadings for conservation values of watersheds in Mendocino County. One notices a Very High rating for the Alder Creek watershed toward the southern third of the Mendocino Coast. Then one notices mostly darker shades in the latitudinal heart of Mendocino County. That area includes the Little River watershed with a more sizable (for Mendocino County) redwood state park, as well as the Albion River watershed to its south which contains some old-growth remnants. Then it is mostly High conservation values for watersheds until you reach the Noyo River which is rated Medium (yet varies on the more specific chart about the CWE assessment areas in the JDSF area). And then, north of the Noyo River, there is High conservation value, as well as murrelet sightings, at Ten Mile Creek. Thus, this Albion River through Ten Mile Creek area is essential to the recovery of the coast redwood ecosystem and its dependent species -- and seeing that JDSF is in this area and includes substantial amounts of the Noyo, Big, and other watercourses (and is so sizable especially in the west-east direction, this is clearly the place to focus conservation energy in the heart of the redwood region (along with protecting as much as possible of Alder Creek further south).

BLM's Cahto area is mixed conifer rather than redwood, while the lands to the east of the very narrow Sinkyone Wilderness State Park are generally in bad cutover shape. It is still important to conserve remnants of watersheds in those shaded areas indicating coastal watersheds in northwestern Mendocino County -- partly for murrelets who decide to fly to the southwest from their nests at HRSP or from southern parts of Pacific Lumber lands because they do not like to fly over the King Range which is primarily Douglas-fir and thus not ideal murrelet nesting habitat in

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California. But due to it being the heart of the redwood region and certainly the heart of Mendocino County's redwood region, that Ten Mile Creek watershed through Albion River watershed (including the sizable acreage at JDSF) appears to be the most vital area if murrelets are to survive in Recovery Region 5 (and many argue in Recovery Region 6) for the next few decades.
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PACIFIC FISHERS

I notice on Map Figue M that there is no "fully suitable" Pacific fisher habitat at JDSF. There are some areas of JDSF which are adjacent to some "fully suitable" fisher habitats on private land, state park land, or Mendocino Woodlands area. Since fishers like a wide range of mostly old-growth with good canopy cover, on areas adjacent to "fully suitable" fisher habitat, there should be no logging -- even theoretically designed to develop "late seral" characteristics. This would include the northeastern end of Brandon Gulch CWE assessment area (which should generally be left alone anyway due to it having that large older mature forest), upper West Chamberlain area (also largely a key mature stand which also should be avoided as far as timber management activities), in some areas by the state parks to the west, in areas adjoining that private land which juts north of Highway 20 in the south-central area of Jackson forest, and by the Mendocino Woodlands area.

Besides some moderate to high fisher habitat on the map toward the west and in other areas, I note that the areas with the most moderate-to-high fisher habitat at Jackson are in areas proposed for especially heavy logging in the next 5 to 10 years, namely the Chamberlain Creek watershed, the Brandon Gulch CWE area, the Berry Gulch area, and the Parlin Creek area. It seems that the forest managers at Jackson have chosen precisely those areas which are best habitat for fishers to log -- which would be a disaster for this species that needs large ranges, good canopy, and little fragmentation. Page VII.6.6-13 points out some key habitat needs for fisher and marten, "Stand level characteristics of importance to forest carnivores (marten and Pacific fisher) include canopy closure, snag and log frequency". It is admitted that Alternative C1 would result in a 7% reduction in Pacific fisher habitat from this time through the year 2030 -- and I believe this is quite an underestimation, while the fragmentation due to clearcut variations under new Alternative G certainly would not assist in the recovery of the Pacific fisher in the JDSF area.

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NORTHERN SPOTTED OWL

I notice that there were most NSO sightings in the Brandon Gulch CWE assessment area, followed closely by the Parlin Creek CWE assessment area. Yet, the Proposed Alternative plans to log 40.4% of the Brandon Gulch CWE assessment area within the next 5 to 10 years (likely targetting the best NSO habitat other than the fairly limited ancient stands themselves). Such butchering of mature stands must not take place! The Parlin Creek CWE assessment area is being substantially targetted too (as is Berry Gulch to the south which has also had NSO sightings), and it already has been quite cutover. Furthermore, the plans for clearcutting / evenaged management in the central and eastern parts of the forest will definitely ruin the NSO habitat not only in Parlin and Berry Gulch, but also some areas recovering in the Chamberlain and perhaps James Creek area (though the table with planned percentages of CWE assessment areas to be logged in the next 5 to 10 years does not include the James Creek area). Thus, there is quite a difference between declarations (to please lawyers) like "silvicultural allocation plan and silvicultural practice retains and creates habitat available for Northern Spotted Owl" and the plans for logging in areas at JDSF which have had the most NSO sightings. It is ironic that the document says, "As budget allows, expand more staffing to include greater biological expertise." No wonder the Proposed Alternative is harmful to habitat -- it is admitted that there is little biological expertise at JDSF! Do NOT log the mature stands in order to higher a biologist who may well conclude that you just finished off the

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best NSO, fisher, and murrelet recovery areas in order to hire them! (There was a NSO sighting in southeastern Chamberlain CWE assessment area, as well as in southeastern James Creek and along the Big River nearby, yet southeastern Chamberlain is scheduled for group-selection logging which would decimate NSO habitat features.)

Page VII.6.6-28 says that, "Franklin (2000) found that for Northern Spotted Owls, in his Northern California study area, an increasing amount of forest edge could be detrimental by decreasing the amount of interior habitat, increasing predation rates, and reducing the survival rate." Thus, do not log those larger mature stands adjoining the smaller ancient stands in the Brandon Gulch and West Chamberlain areas, and do not claim that mere riparian areas where logging is somewhat limited can suffice for interior forest habitat even more than a century down the line.
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In my initial enumerations as to basic problems with this Draft EIR and FMP for JDSF, I mentioned that there is too much "wiggle room" or leeway to allow even the logging of old-growth trees at JDSF -- let alone, for now, the sizable mature trees which are so rare in the redwood region of coastal Mendocino County. Page V-11 says, "The JDSF DFMP proposes to protect all old growth redwood stands, as well as individual old growth trees that have defined structural characteristics." What percentage of old-growth trees other than those in the unentered old growth redwood stands could face being cut down? Is it the RPF who gets to determine whether an old tree has sufficient enough structural characteristics to let it live? Be as specific as possible in the next EIR / FMP as to which old-growth trees could live and which do not qualify. Seeing that you mention old-growth trees with "defined structural characteristics", it sounds like there is a working definition to determine whether an individual old-growth tree would be left alone or would be logged. Please present this precise definition in the next EIR / FMP. Likewise, leeway is left to timber managers on page VI-49 of that table which says "Retain existing old growth groves, retention of large residual old growth trees and old trees with structure". Though old-growth trees would be comparatively large in general, but if an old-growth residual was not a dominant tree in a clump / aggregation, could some of that clump be logged of old-growth residuals since it was not comparatively large for old-growth residuals? Also, which kinds of both old-growth residuals or other old trees (and approximately what percentages) could be not declared to have an adequate "structure", and thus be logged? Another disturbing excerpt from the Draft EIR / FMP is on page VII.6.1-97, "Some flexibility should be maintained to allow removal of large trees to adjust species composition and improve the potential performance of future LWD". Much as some more LWD could be good at some sites at Jackson, the history of forest management has not demonstrated that the JDSF managers can be trusted with this "flexibility."Also, I see nothing here about if there is an old-growth Douglas-fir stand or clump / aggregation -- is there any protection for ancient Douglas-firs other than some which may be within unentered ancient redwood groves?

I do like Alternative F in terms of protecting "heritage trees" (trees that were living when California became a state in the middle of the nineteenth century) -- unless they are particularly a hazard that would impact people or property. This would get rid of the 'wiggle room" which would allow the logging of old-growth and trees which could be termed between some people's definition of old-growth and their definition of "very mature". Yet, the rare (in regional context) mature trees (generally 80 to 120 years old) need substantial protection as well.
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The documents admitted that little has been done at JDSF since the court injunction blocking the woefully inadequate Draft EIR / FMP back in 2003. In the meantime, the lawyers reached the conclusions that needed to be made, and these latest documents are a flailing attempt at trying to make manipulated biology and manipulated logic try to fit neatly with the lawyers' conclusions.

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Publishing hefty volumes may impress some, but why aren't the noted references which are mentioned summarized, while giving quotes from those documents to show that indeed they support the conclusions of this Draft EIR / DFMP?

There are a lot of matters I noticed in these JDSF documents which mention that more information is needed, plus there are many JDSF issues where it is presumed that sufficient information is available and presented, but which actually are very vague and non-specific. Some of these are what specific areas will be newly roaded and logged under C1, and what would the consequences be for habitat for various sensitive species if such actions were carried out (including for aquatic species). One of these key tasks which should have been done already and should have been presented in these draft documents (or at least by the next EIR / FMP) are the need for specifics as to what parts of the cumulative watershed assessment areas would be logged during the next five to ten years under Alternative C1 and under other alternatives. Another task clearly needing to be done is to examine the erosion and sedimentation impact on streams from the major storms of late 2005 and early 2006 on various watercourses at JDSF, and it is crucial to take temperature readings in August and September 2006 to be clear on the impact of sedimentation on the watercourse which could deleteriously impact Coho salmon, steelhead, and other species. Likewise under new Alt. G, I am concerned with the hefty acreage to undergo clearcut variations, with the lack of detail about what would be logged within cumulative watershed assessment areas, and with the great unknowns as to whom would be on a Board-appointed Advisory Committee to help develop a landscape management plan for Jackson DSF.

Other information which should be able to be produced in a relatively short length of time are: 1. a temperature TMDL should be developed for the Big River watershed; 2. a more accurate vegetation map to distinguish between old redwoods with generally closed canopy from scattered old redwoods with dense understory such is in some of the James Creek area; 3. more specifics as to how many old-growth residual trees and mature trees can and will be logged (since this helps to determine how much increase there will be in edge effects, and in sedimentation of streams which also can impact temperature, how much decrease in shading of watercourses, how much management activity is planned in steep landslide prone areas and inner gorges, where new roads are planned and how many of these are clearly linked to a better location for a road to replace hopefully several nearby roads which have particular erosion / sedimentation problems); 4. let a recreation specialist or perhaps an artist or landscape architect, rather than a RPF, determine whether a logging project will significantly impact the aesthetics of an area; 5. consider new recreation corridors as well as protecting more than just narrow facade strips along roads and trails; 6. complete a recreation survey as called for in the Draft EIR and include these results in the next EIR / FMP; include the James Creek Watershed Cumulative Effects Assessment Area on Table VIII.10 on pages VIII-37 (and VIII-38) or else have no cut in this area in the next 5 to 10 years; and explain by words and by better labelling of maps where the 492-acre buffer around Road 334 which to be managed for late-seral characteristics is, as well as where the 250-acre buffer around the waterfall grove complex (also to be managed for late-seral forest characteristics) is.

ROADS, TRAILS, and FEEDING of ANIMALS who are GRAZERS

Page VII.6.1-100 says that, "JDSF contains an estimated 350 miles of actively used roads and 150 miles of potentially improperly abandoned roads. The sediment contribution per unit area from roads is often much greater than that from all other land management activities combined, including log skidding and yarding (Fumiss et al. 1991)." Elsewhere in the documents it is mentioned that the public uses 200 miles of road at JDSF. Page VII.2-12 says, "Aesthetic changes associated with paving a forest road would be less than significant whereas, establishing a new forest road may be significant." Thus, to abide by regulations, any new forest road should not be through or adjacent to mature or ancient forest areas, and it must be clearly needed for management activities and be in the general vicinity of several logging roads which have been decommissioned due to significant

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sediment from the roads having deleterious effects on watercourses in the area. All other new roads are clearly an aesthetic insult and would bring more edge effects which stresses (or results in deaths of) various species, plus can damage nearby watercourses. Even modern improved road-building techniques has done little to reduce sediment yields from the construction of new roads. Appendix 11 Page 5 says, "Significant construction of new roads has led to increasing sediment yields from road surface erosion, espite improved practices (see Table 27 in the Attachments, reproduced from Matthews 2001)." Page 11 of that Appendix points out that road-related sediment is the dominant source of sediment in both the Noyo and the Big Rivers. One should also realize that roads (and vehicular management activities largely using them) are the main spreader of non-native invasive plant species -- so there is another reason to minimize roads in the JDSF area.

It is insufficient to merely say regarding Alternative C1 that you will, "Decommission unnecessary and environmentally damaging roads." You need to give a general estimate regarding the approximate number of miles of road that would be decommissioned, since taking out just a token number of road miles when JDSF managers have such widespread logging plans (which include building some new roads, logging nearly all the mature forests, as well as logging in riparian areas which could also impact shading, sedimentation, and temperature of watercourses) is certainly insufficient evidence to be able to claim that overall there would be an insignificant cumulative impact from management activities proposed at JDSF. And while some principles under new Alt. G- in regards to recovery are an improvement, yet it is very vague as to how this principle would be translated into road decommissioning (or perhaps road-building) on the ground.

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I appreciate the urgency which Alternative F has (noted in Table VI.1 on pages VI-45 and 46) in regards to immediately inventorying unnecessary and/or damaging roads, and that it is clear that this activity would take priority over other management activities at JDSF. It is not that I believe that Alternative E would not wish such a focus too, but the way it is worded in the aforementioned table, while it calls for aggressive road decommissioning, it mentions nothing about immediate inventorying and decommissioning or a focus for allotment of funds for that alternative. Perhaps that is because it is clear that JDSF managers consider Alternative F the enemy and will not really consider this fine alternative to work toward restoring the lovely habitat and watershed condition which those of European extraction found in Mendocino County centuries ago, as well as protecting the best remnants currently at JDSF. I notice that under Alternative C1, it says that the road management "plan includes standards for 5-year inventory, construction, maintenance, and decommissioning; establishes a schedule repair and decommissioning work. Not only does this give no indication about whether there would be a dozen or a hundred or how many miles which might be decommissioned, and it is clear that JDSF personnel are in no hurry to do the inventory and are more focused on the earlier mentioned "construction" and "maintenance" than in taking out roads to reduce sedimentation so as not to damage salmonid habitat in watercourses. Under "Transportation (see also Road Management Plan)" part of the alternatives comparison Table VI.1., the wording for C1 (following the lawyer-mandated assurance that it would "Comply with FPRs and sediment TMDLs where applicable") is "Roads and landings constructed and reconstructed as needed to support harvest operations." This does indicate the priority of JDSF under the proposed alternative as far as roads -- the priority is constructing and reconstructing to assist timber operations. Thus, the talk of inventory and decommissioning of roads at Jackson is just a token non-enumerated effort to seek to validate the claim that watercourses would be in better shape despite intensive management on 75% of the forest (including substantial clearcutting / evenaged management as well as many other intensely chopped areas) due to decommissioning a not-even-estimated number of roads or mileage of roadway.

There are various indications in the Draft EIR / FMP that trails are virtually an afterthought from the perspective of JDSF managers. Page V-26 says, "There are over 60 individual campsites, many

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miles of riding and hiking trails, and over 200 miles of forest road utilized by the public." For a nearly 50,000 acre forest, obviously 60 individual campsites are not very numerous. Why is there no attempt at enumerating the miles of riding and hiking trails at Jackson? Is it because some of the trails are mostly animal trails and thus you do not know whether to count them, or has there just been so little recreation focus that there was never an attempt to enumerate how many miles of recreation trails (other than some roads) are being used by the public? Also, while a recreation survey is a decent idea, it doesn't take a rocket scientist recreation specialist to determine that, besides liking to hike some trails, many hikers and campers like to immerse themselves in Mother Nature, so butchering the forests other than along streamsides and major roads and trails (while even cutting in most of these facade buffer areas) is clearly not what most who would like to enjoy redwood forests without travelling an additional distance to Humboldt County have in mind for an environment that they wish to further explore. (Also, note some discussion on the main recreation areas on the forest when discussing mature forests, as well as some of the alternatives offered in the Draft EIR / FMP.)

While I can see why there are some concerns about horses and other animals which folks ride or perhaps which carry their belongings freely grazing on vegetation at JDSF, yet urging or requiring people to bring feed / mulch to feed to their animals is also a problem. Not only are increasing amounts of mulch (whether used for feed or for management-related activities at Jackson) genetically modified these days (which will increase if genetically modified alfalfa is commercialized), but mulch often carries seeds of invasive plants which we do not need more of in the JDSF area. Would JDSF managers consider that if certain invasive plant species are good to eat for horses and other livestock, that the target plants could be pointed out to riders and could be grazed upon at least near roads and trails which are some of the areas in which invasive plants thrive?

In case anyone needs to be reminded of the seriousness of mulch spreading invasive plant species, here are a couple quotes from page 3-26 of the BLM Vegetation Treatments Using Herbicides Draft Programmatic EIS, "Many other invasive plants have been introduced unintentionally via air, water, rail, or road transportation pathways. Common methods of introduction include contaminated seed, feed grain, hay, straw, and mulch; movement of contaminated equipment across uncontaminated lands; animal fur and fleece; spreading of gravel, roadfill, and topsoil contaminated with noxious weed seed; and plants and seeds sold through nurseries as ornamentals (USDI BLM 1996)." "Once introduced, invasive plants are spread primarily by vehicles, humans, wild horses, livestock, wind, water, and wildlife. Initially, invasive weeds may get established in disturbed sites such as trailheads, along roads and trails, firebreaks, landing pads, oil and gas development sites, wildlife and/or livestock concentration areas, and campgrounds". (Speaking of firebreaks, will the shaded firebreaks mentioned in the plan involve the spraying of herbicides on them?)
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INTENSIVE MANAGEMENT Leads to FIRE DANGERS at JDSF

The logging of old trees (which provide shade and are well along in developing a plumbing system to provide a more ongoing flow of cool clear water), the drying effect from spraying herbicides, plus the fire risk involved with lots of machinery being operated on hundreds of miles of roads well as the drying effects of herbicide spraying, plus all the machinery used in management and along hundreds of miles of roads from which fires can accidentally or purposefully start are all major drawbacks of the Proposed Alternative C1. Regarding logging slash, it sounds like it might be gathered and burned in some clearcuts (obviously a slash fire is a fire and can escape at times), or just left on the ground upon other logging methods with a slight mitigation of scattering slash after

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logging within 50 feet of major roads and trails. Besides that, the highly flammable slash will be on the forest floor awaiting ignition.

It is quite obvious that if one removes all or nearly all vegetation from an area, it will dry out the area and provide deleterious edge effects to certain adjoining areas. Then, herbicides are sometimes used, which kills vegetation and dries things out further. Then, conifer trees (all of the same age and usually all the same species) are planted in a heavily stocked way. When one has a bunch of essentially Christmas trees all packed together, it not only could be prone to disease, but it is a virtual tinder box for not just fire, but for fire that is prone to burn more catastrophically which could also rise to become a crown fire and even seriously damage or kill ancient redwood trees in the JDSF area.

The DEIR / DFMP claims that the less intensive management alternatives are most prone to fire danger because a number of roads from which one could fight fires would be decommissioned. Certainly, a number of roads can remain not only to fight fires or for recreationists to use, but also for management activities. But, this document entirely fails to examine the implications in regards to forest managers promoting intensive vehicular and machinery activities in the majority of the JDSF. Other activities which increase fire danger are the use of herbicides, the increase in fire danger due to logging mature and other stands and replacing them with tightly packed conifer plantations, and even the further drying out of buffer areas intended for lighter management. There can be some valid excuses for managing an understory and brushfields in some places in order to lessen chances that there can be crown fires in the area, but seeing that even relatively light management at JDSF generally targets the larger trees of the area, the preponderance of proposed management at Jackson would lead to increased risk of fire -- including potentially catastrophic fire.

Page B-29 of the BLM's Vegetation Treatments Using Herbicides Draft Programmatic EIS says, "Herbicides used in site preparation reduce vegetation that would compete with conifers. In the brown-and-burn method of site preparation, herbicides are used to dry the vegetation, to be burned several months later." It should be pointed out that equipment use or smoking around herbicided vegetation on roadsides or in areas where intensive management activities occur would have a greater chance of igniting and spreading if there were drier dead vegetation around.

The DEIR / DFMP does nothing to analyze what age of tree species would be best to prevent not only fires, but catastrophic fires. Such fires could burn not only vital habitat, but could necessitate fire-fighting response with heavy equipment (including near watercourses) in order to control the fire, which could bring a horrible impact of less trees and vegetation shading streamcourses and thus more direct sunlight and warmer temperatures in streams (plus destabilized banks due to less living vegetation holding them together and due to heavy equipment use during firefighting). The ramifications on both native salmonids which need cool water to survive, as well as on mature and old-growth forest habitat if a fire burning super-hot through young plantations grew to a catastrophic level are very serious -- yet there was no analysis of such in the documents!

Because California Public Resources Code 4640 says (App. 5 pg. 2) that, "'Protection' means protection of forest trees against damage by fire, insects, disease, and trespass", i contend that this is being violated at Jackson DSF, and that the fire danger involved with the bulk of the management activities at JDSF must be analyzed in the next EIR / FMP.

STREAM TEMPERATURES and AREAS TARGETTED for LOGGING in Near-Term

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The U.S. EPA has listed both the Big River and the Noyo River as sediment-impaired under Section 303(d) of the Clean Water Act. The North Coast Regional Water Quality Control Board has listed Big River for both temperature and sediment concerns, while just listing the Noyo River for sediment concerns. Sediment TMDLs have been established for both of these rivers, but a temperature TMDL has yet to be established for Big River. Page V-16 says, "These sediment and temperature impairments are of particular concern due to the presence of listed salmonid species in these watersheds, specifically, coho salmon and steelhead trout (Figure V.5). These listings of the Big and Noyo River watersheds as impaired are an indicator of existing adverse cumulative effects in these watersheds."
This should happen certainly before a long-term management plan is adopted for JDSF.

On March 30th, 2005, the Coho salmon was listed as endangered under the California Endangered Species Act for the population south of Humboldt County's Punta Gorda area. NOAA Fisheries followed suit to list the Central California coast population of Coho as endangered on August 29th, 2005. The Northern California Evolutionary Significant Unit of the steelhead trout was listed as threatened on August 7th, 2000. All accessible reaches of coastal streams between southern Humboldt and southern Santa Cruz Counties have been declared "critical habitat" for the Coho salmon, while 50 occupied watersheds for the steelhead were delineated as critical habitat for the steelhead early this year.

It is important to examine (especially during the late summer rearing stage) the maximum weekly average temperature in watercourses, and this is especially important this year to see if there is an increase in temperature this year (despite plenty of rain) due to what could be substantially more sedimentation than usual from the major storms of late 2005 and early 2006. The Coho salmon, even more than the steelhead trout, particularly needs temperatures preferably cooler than 62.2% F, and certainly usually below 63.7% F at that critical rearing stage time of year.

Page 9 of Appendix 12 points out that, based on thresholds for interpreting water temperature, several areas in the JDSF CWE assessment area were potentially of concern. These included the South Fork of the Noyo River (including Parlin Creek) and the North Fork of Big River (including Chamberlain and James Creeks). Considering these concerns, which are also reiterated by examining the map on Page VII-6.1-28 about some on-the-brink temperature readings in certain areas of JDSF, it is appalling that the very watercourses that have temperatures almost too warm especially for Coho salmon, are precisely the CWE assessment areas targetted for intensive logging activities in the next 5 to 10 years at JDSF! Clearcutting is the preferred logging method under Alternative C1 for much of the Chamberlain Creek and Parlin Creek CWE assessment areas. It does not take a fisheries biologist to conclude that more roading, widespread clearcutting, herbicide spraying and other logging will have significant unmitigatable impacts on sensitive aquatic species including listed salmonids in these key tributaries, as well as the North Fork Big River and the South Fork Noyo River themselves. In addition, the CWE assessment area especially targetted in the near future, Brandon Gulch (which includes the North Fork of the South Fork Noyo River), would also contribute warmer water than usual to the mainstem of the South Fork Noyo upon massive logging of its vast tracts of mature forests. Note that Appendix 12 Page 19 says that, "The potential impact of timber harvesting on water temperatures can result from a single action, or the cumulative impact of multiple harvests." Plus, remember that roads are the largest source of sediments into watercourses, and Alternative C1 plans numerous more roads, and proposes a vague eventual decommissioning schedule, whereas Alternatives E and F are serious about road decommissioning if they could only get chosen and funded to carry out these worthy endeavors to help the aquatic habitats at JDSF.

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The Proposed Alternative C1, despite claims to the contrary, will result in increased stream temperatures in most years. Some of this increase will occur due to the following activites: logging in streamside areas; increased sedimentation into watercourses due to intensive timber-cutting and roading activities; roading and logging on steep slopes or in inner gorges; focused intensive logging in watersheds which already have temperatures which are on the verge of being too warm to support Coho salmon and steelhead trout; poor management at JDSF across most of the landscape which increases danger of fire with many associated repercussions on watercourse temperature (even if a major fire doesn't envelop the bulk of streamside vegetation which would amplify negative impact on watercourses as would the equipment used in firefighting); plus other factors.

Consider the plans under the proposed JDSF alternative C1 in regards to logging in the streamside buffer areas. Obviously, large conifer trees have been targetted for logging historically, which means that hardwoods tend to be present in greater proportion than their historic numbers. The ten largest trees in a stream area longer than a football field supposedly must be left standing, but I'm sure most of the other sizable conifers will be logged even if it means opening up the canopy more than theorized in the document. Hardwoods are supposed to be retained unless they are at a higher than their naturally-occurring percentage. Thus, it is likely that most medium to large conifers will be logged from such areas, plus substantial amounts of hardwoods will be logged in order to bring species composition back to historical levels. This will result not only in direct solar radiation warming watercourses, but also in increased sedimentation of watercourses due to soil disturbance and streambank disturbances.

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I will once again call for either rejecting this quite inadequate Draft EIR / FMP, or I call for adopting Alternative E while devoting funds to take out many unnecessary and damaging roads, plus funding in-stream salmon restoration and expanding some recreation opportunities though not focusing this recreation on the western portion of the forest unless it is agreed with some state parks to accomodate some of their campers if they want to close campsites closer to marbled murrelet nesting areas. Also in regards to the western portion of JDSF, the couple murrelet recovery areas under Alternative F make a lot of sense, and it is absolutely appalling that in what should be the geographical heart of this recovery area, there is this horrendous supposed "clearcutting experiment" and considerable infestation of Tasmanian blue gum (eucalyptus). I understand that this EIS / FMP cannot impact the Caspar Creek management mess, but the Board of Forestry likely has that power and should act immediately!

And, of course, need I mention again that the document has many unmitigatable cumulative impacts to aesthetics and to sediment / toxics / increased temperature in Coho salmon / steelhead / amphibian streams. The documents are largely in denial as to the existence, the biological importance, and the current and especially near future habitat value of the most extensive mature stands of redwood (with some fir) in Mendocino County. And, of course, the document tries not to realize that, despite historic abuses in the area, Jackson Demonstration State Forest can be the heart of the most hopeful area to recover habitat for old-growth forest dependent species in Mendocino County -- since it is in the heart of the area of good conservation value between the Ten Mile Creek watershed to the north and the Little River and Albion River watersheds to the south. Good management (which in some areas involves lack of management) at JDSF is the hope for continued existence (and even thriving) of Coho salmon, steelhead, and amphibians in the Noyo and Big River watersheds which will have positive repercussions elsewhere in the county and help bolster the struggling marbled murrelet population in Recovery Zone 5 to hopefully some day link up with the

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murrelets in Recovery Zone 6 – rather than have them meet the fate of the prdiction of 100% likelihood of extirpation south of the Humboldt / Mendocino County line by he year 2044.

For all of its paper and words, this Draft EIR / FMP does not give adequate specifics or analysis to justify ridiculous conclusions as to how the aggressive logging and roading of Alternative C1 will not result in cumulative impacts to various aspects of the environment including impact to threatened and endangered species. You must either reject this document in its entirety, or else choose what is admitted within the DEIR / DFMP to be the most protective of the environment -- Alternative E. Please choose E and strengthen it by focusing funding on near-future road removal and salmon habitat restoration, as well as expanding recreational opportunities in certain parts of the forest.

Finally, some of the legal statutes violated by Alternative C1 include California Code of Regulations §1422 on Polluting Waters, California Public Resources Code §4640 due to widespread activities at Jackson that increase fire danger, the federal Clean Water Act due to likely temperature increase in watercourses beyond the legal limit if the Proposed Alternative is carried out, as well as violating cumulative effects regulations of the state, and violating the federal and state Endangered Species Act due to obvious negative impacts which Alternative C1 would have on current and future habitat for the marbled murrelet and northern spotted owl. New Alternative G would also violate
17 many of these statutes unless management activities under ALT. G- avoid mature and ancient stands, avoid the use of herbicides, and focus more on Marbled Murrelet recovery and Late-Seral development.

Sincerely yours,

Bruce Campbell

Bruce Campbell

Yours truly,

Bruce Campbell

Bruce Campbell

29.

Mailed Letter GM-39

This letter represents a resubmission of DEIR comment letter P-183, with the addition of a number of handwritten annotations. These annotations represent new comment and are addressed here.

Response to Comment 1
The writer states that additional area of JDSF should be managed as potential habitat for the marbled murrelet to help in the recovery effort and to make up for past clearcutting in the North Fork of Caspar Creek. He further states that the Jughandle and Caspar Creek watersheds are in close proximity to occupied murrelet habitat, and that the old-growth and mature stands should be protected.

In addition to the supplemental areas designated in Alternative G for development of marbled murrelet habitat (upper Russian Gulch and lower Big River areas), the marbled murrelet management measure specified in the DEIR will be applied. This management measure will involve future consultation with wildlife management agencies to consider additional habitat development area for the species, including area within the Jughandle Creek watershed. The purpose is to provide for future habitat development. Further, the USFWS is in the process of considering the designation of critical habitat for the species throughout the region.

Please also see response numbers 80, 84, 90-95, 97 and 98 to the letter by Bruce Campbell, dated February 24, 2006 (DEIR comment letter P-183). Significant impacts to the marbled murrelet are not expected to occur. Also, please see DEIR Section VII.10 for an assessment of potential watershed effects. Significant and cumulative impacts are not expected to occur as the result of past clearcutting in the North Fork of Caspar Creek.

Response to Comment 2
These are reiterated concerns from Mr. Campbell's earlier letter of February 24, 2006. Mr. Campbell would prefer that all of the "mature forest" and "mature trees" be retained to aid in recovery of endangered species. Please see responses to the February letter.

Response to Comment 3
The writer requests that "mature stands and mature trees" not be harvested by even-aged methods. He also suggests two constraints if even-aged management is ultimately included in areas with "mature stands". He further states that even-aged management should not "hurt watercourses, connectivity, or recovery chances for the Marbled Murrelet". Even-aged management will be planned and conducted to avoid significant impact to these resources. These are reiterated concerns from the earlier letter of February 24, 2006. Please see responses to the February letter.

Response to Comment 4
The status of the marbled murrelet has been considered. The USFWS is the entity responsible for creation of a recovery plan for the species. The state forest will contribute to the recovery of the species through the management of a significant area to recruit or develop late seral forest and older forest characteristics. In addition, large old-growth trees and old-growth groves will be preserved.

Response to Comment 5
Please see response #1 to February 24, 2006 letter. Alternative G adds to the protection and restoration of older forest by designating additional area for development of habitat for the marbled murrelet and through establishment of the Older Forest Structure Zone.

Response to Comment 6
Please see response #4 to February 24, 2006 letter. Alternative G adds to the protection and restoration of older forest by designating additional area for development of habitat for the marbled murrelet and through establishment of the Older Forest Structure Zone.

Response to Comment 7
This concern represents speculation. Please see response #14 and 15 to February 24, 2006 letter.

Response to Comment 8
Please see response #16 to February 24, 2006 letter. No variants of the clearcut method have been proposed. Many silvicultural variations may be practiced as elements of even-aged management.

Response to Comment 9
Please see response #56 to February 24, 2006 letter. In general, Alternative G offers a greater degree of environmental protection than Alternative C1. Alternative G includes greater restriction on the use of clearcutting and other forms of even-aged management.

Response to Comment 10
Please see response #57 to February 24, 2006 letter. A special treatment area exists adjacent to all state parks were the proposal to utilize silvicultural systems must be accompanied by a consideration of the values associated with the park, including aesthetic resources. Each proposal to harvest timber includes a site-specific assessment of the potential effects upon aesthetics and recreational values.

Response to Comment 11
Please see response 6 above and response #86 to February 24, 2006 letter. Alternative G increases the area dedicated to larger and older trees and forest management, while further reducing and restricting the use of clearcutting and even-aged management.

Response to Comment 12
Please see response #97 to February 24, 2006 letter and responses above.

Response to Comment 13
Please see response #106 to February 24, 2006 letter. Alternative G will reduce the edge effects and fragmentation associated with management, due to a reduction in the use of even-aged management and the designation of substantial area to an Older Forest Structure Zone and recruitment habitat for the marbled murrelet.

Response to Comment 14
Please see response #114 to February 24, 2006 letter, and response 13 above.

Response to Comment 15
Please see response #122 to February 24, 2006 letter. The committees to be established will be purely advisory to the Department and the Board. The Board is ultimately responsible for state forest policy and approval of management plans. Management plans are prepared by the Department for review and approval by the Board. Anticipated future projects are disclosed in RDEIR Alternative G Table II.3, and other future plans are discussed and considered throughout the DEIR and the management plan.

Response to Comment 16
Please see response #135 to February 24, 2006 letter. The Road Management Plan establishes a program for inventory of the road system, followed by prioritization of maintenance, improvement, and decommissioning activity.

Response to Comment 17
Please see response #158 to February 24, 2006 letter and responses above.

GM-40

June 20, 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 Mendocino Working Group (MWG) has been reviewing and discussing Alternative G. Subsequent to our MWG meeting on Tuesday, June 12, we decided it was appropriate to clarify our position on a few issues.

1 As we stated in our February letter we feel strongly the proposed Jackson Advisory Group (JAG) is essential to the long term success of this Management Plan. For the sake of transparency, credibility and effectiveness one advisory body needs to be in a leadership role during the interim period. Our group feels strongly this lead advisory body needs to be the JAG, in consultation with the other groups. In addition, as the MWG suggested in our February letter, we feel that the authority and effectiveness of the JAG would be strengthened by being appointed by the Director and ratified by the Board of Forestry. To maximize the effectiveness of the JAG, it should report to the Director on forest management implementation issues and to the Board on management policy issues.

2 Evenage management has always been a controversial subject and we feel some clarification is warranted here also. A goal of our recommendations is to provide the necessary flexibility for all research projects. Nothing in our principle statements was meant to preclude meaningful, scientifically designed evenage research projects during the interim period or into the future, with the important condition that the projects be of the minimum size required for scientific validity.

3 Some evenage management projects may conflict with some of Alternative G's stated goals, such as promoting forest health and ecological processes and providing enhanced opportunities for recreation and aesthetic enjoyment. Further, evenage management is extremely controversial within Mendocino County and the environmental community at large.

4 We recommend that great care be exercised before approving evenage management projects not directly tied to a specific research project or justified for forest health. We recognize that not all future research needs can be foreseen, but we feel that a workable planning process is needed to assure that stand manipulation for future research is appropriately balanced against the other goals for future conditions. Therefore, we recommend that decisions on stand structure for future unspecified research projects should be developed by JDSF staff in cooperation with researchers,

4 the Demonstration State Forest Advisory Group (DSFAG) and, when functioning, the JAG. The amount of evenage management should be the minimum that reasonably can be justified for future research projects that can't presently be anticipated.

5 We note there has been no revision of Jackson's residual old growth harvesting policy, which differs in significant ways from our recommendation. We believe review of this issue by the JAG is necessary to minimize potential future controversy.

6 The last issue the MWG would like to address is the short-term harvest proposal. We understood that the Board's EIR subcommittee accepted the MWG's concern that interim harvesting should not preclude future planning options and agreed to our recommendations for achieving this objective. We recommended that if THPs were to be proposed for sensitive areas in the interim period that they should **both** 1) meet the interim harvest restrictions, and 2) be submitted to the DSFAG or, when operational, the JAG for review. CDF developed a map that shows sensitive areas in purple (Alternative G Map Figure 2).

7 We are concerned that although the THPs in Section 1 of Table II.3 conform to the interim harvest restrictions recommended by the MWG, they are listed as **not** being subject to DSFAG or JAG review.

We believe that everyone's interests are in resuming operations in Jackson in a way that minimizes the chances for reigniting controversy. DSFAG or JAG review of sensitive THPs will significantly reduce the chances of a misstep. Such review will provide a forum for the public and provide the public with greater assurance that the THPs implemented in the interim period are chosen and designed so as to keep open future options for restoration, habitat, and recreation to the maximum extent feasible, consistent with the need to generate revenue to fund interim operations of the forest.

The MWG recommends that all interim-period THPs proposed for sensitive areas be reviewed by the DSFAG or JAG, provided the review does not unnecessarily impact JDSF staff's ability to move forward with the 2008 sale program.

8 We recognize the importance of resuming operations in Jackson Forest in 2008. The MWG does not want the recommended advisory committee review to disrupt the 2008 JDSF Timber Sales Program. At the same time, we would like to have as effective as possible review of proposed THPs consistent with this desire. To achieve these twin goals, we ask the department to 1) identify those THPs that are prime candidates for 2008 harvests and to have the DSFAG review these plans as soon as possible so that preparation of approved plans can proceed with assurance of acceptability, and 2) to expedite formation of the JAG so that it can take over the review process as soon as practicable.

9 The MWG would especially hope that the JAG could review the North Fork Spur and the West Chamberlain THPs, because both of these contain some unentered stands of old second growth and are in an area of high recreation potential.

10 One issue that still needs deliberation as this process moves forward is the final resolution of the two enjoined plans. Nothing in any of our correspondence is meant to state or imply that the contract holders of the two enjoined timber sales relinquish any right or expectations that their agreements will be fulfilled.

We are very appreciative of the Board's previous willingness to accept many of our recommendations. We hope that you will consider modification of Alternative G to conform to the aspects of our original recommendations that we highlight in this letter. We believe that these changes are important to our shared goal of operating Jackson Forest in the public interest and without further conflict.

Sincerely,

Bruce Burton	Kathy Bailey	Art Harwood
Vince Taylor	Mike Jani	Mike Anderson

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Mailed Letter GM-40

Response to Comment 1
Comment noted. Alternative G contains many provisions in direct or close alignment with the recommendations of the Mendocino Working Group.

Response to Comment 2
Comment noted. It should be noted that in addition to research projects implementing even-aged management, the proposed management plan by necessity also includes even-aged management independent of research projects, in order to create and maintain the desired future conditions outlined in RDEIR Table 1. Most of these harvests will occur under even-aged systems that retain substantial portions of the pre-harvest stand un-harvested to provide shelter, habitat and aesthetic enhancement. Under no circumstances will the limitations on clearcutting specified in the management plan be exceeded.

Response to Comment 3
The commenters claim is too vague to provide a complete response. They do not provide specifics of their claim that some even-aged management projects may conflict with some of Alternative G's stated goals, such as promoting forest health and ecological processes and providing enhanced opportunities for recreation and aesthetic enjoyment. It is not clear what is meant by "promoting ecological processes".

The Board believes that the proposed management plan contains only even-aged management projects that are in agreement with the stated goals of Alternative G as approved by the Board.

Response to Comment 4
The Board agrees with the commenters. The Board believes the Jackson Advisory Group and the DSFAG will fill an essential role in crafting a lasting consensus solution for future even-aged management on JDSF, which meets the research and demonstration needs of JDSF and wins the support of the public.

Response to Comment 5
Comment noted.

Response to Comments 6, 7, 8
The commenter expresses concern regarding THPs in section 1 of Table II.3, which are listed as not being subject to DSFAG or JAG review. These THPs were agreed to be acceptable to move forward without review. This is not an environmental impact issue. The Board shares the MWG's concern over resuming operations on JDSF in 2008.

Response to Comment 9
The environmental impact being expressed is unclear. Harvesting old second-growth does not in and of itself constitute an environmental impact. The area of old second-growth will increase over time under this management plan. In order for JDSF to remain a managed forest and meet the goals of the proposed management plan, specifically the desired future conditions in Table 1 in the management plan, many areas of old second-growth by logical necessity will have to be harvested. This is a direct result of the relatively conservative long-rotation management in the management plan, where many even-aged stands will be managed on an 80- to 150-years rotation age.

It is unclear what is meant by "unentered" second-growth. Second-growth stands at JDSF and elsewhere by definition are a man-made entity, and as such cannot full meet the definition of the term "unentered". A second-growth stand has either been planted and/or received some treatments throughout its life, ranging from early stand treatments, spacing, competing vegetation control, stocking control or commercial thinning.

Both THPs referred to have been carefully planned to mitigate any negative impacts on recreation to a negligible level. See also response to comments 6 – 8 above.

Response to Comment 10
Comment noted.