V. Form Letter Responses

This section presents responses to form letters and form letters that contained additional comments. Responses immediately follow each letter and are organized in the same order as the comments in each letter.

F-1

George D. Gentry, Executive Officer
Board of Forstry & Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

Mr. Gentry:

1- The reason for my letter is to insist that you return Jackson Demonstration State Forest to active status. Over the years many of us have enjoyed Jackson Demonstration State Forest for recreational purposes, for others it has supported our households by way of jobs or revenue to our local businesses and communities. The shut down of Jackson Demonstration State Forest has had a devastating effect to our community and our county. In addition the State of California has not been receiving the much needed revenue from the sale of the timber.

2- JDSF was created in the 1950s as a demonstration forest; it has historically been a well managed forest. It is vital that JDSF be returned to an active forest; the revenue and jobs it will provide are very important to our community, our county and our state.

3- I urge you to accept the proposed Alternative B EIR and return Jackson Demonstration State Forest to an active production forest. JDSF's continued operation is essential for everyone.

Thank you for your consideration.

Form Letter 1

Response to Comment 1:
The Board agrees that it would be highly beneficial for the State Forest to fully resume management activities, so the Board is working actively to certify the EIR and approve a management plan. The Board recognizes that Jackson Demonstration State Forest is utilized for the purpose of recreation as well as a source of jobs and revenue for local businesses and communities.

Response to Comment 2
The Board concurs that the lack of active management and timber production in recent years has resulted in the loss of jobs and revenue for local communities and the State. In addition, the loss of revenue in recent years has precluded some management activities on the forest. In particular, an absence of significant revenue has reduced the level of road maintenance and improvement, as well as other aspects of forest management, such as timber stand improvement, stream restoration, research, and recreation.

Response to Comment 3
Support for alternative B is noted. Active management is required by the legislative mandate that created Jackson Demonstration State Forest. The Board supports a balanced, multiple use concept and sustained production of high quality timber products.

F-2

Members Board of Forestry
P.O. Box 944246
Sacramento, CA 94244-2460

Subject: Jackson State Forest

Dear Members Board of Forestry:

1,2,3 4,5,6 7 I strongly oppose the proposed management plan for Jackson State Forest. I oppose the plan's clearcutting, large-scale commercial logging, cutting of the oldest second-growth stands, inadequate stream protection, herbicide use, and lack of a plan to expand recreation. I personally want Jackson State restored to an old growth redwood forest for habitat, recreation, education and research.

8 I oppose approval of the draft environmental document (Draft EIR). It fails to consider the restoration alternative that I favor. The closest alternative, Alternative E, promotes restoration of 9 old growth, but it fails to commit funds to repair or decommission the hundreds of miles of roads that are pouring sediment into salmon streams, nor does it provide for actively restoring salmon 10 habitat or expanding recreation opportunities. 11

12 The draft EIR rules out Alternative E as a feasible alternative, saying it s contrary to state law and Board of Forestry policy. This makes a mockery of the EIR process.

13 The Draft EIR concludes that the state's proposed massive logging plan (Alternative C) can be carried out with "less than significant environmental impacts." This is absurd.

14 The draft environmental document is so huge and obscure that I am unable to review it thoroughly. Its 1500+ pages make the electronic version impossible to use, and the printed copies are too expensive to buy – over $200 per copy!

15 The Draft EIR fails to meet its legal obligation to provide the information and analysis I need to be able to make informed judgments on the environmental effects of the proposed management plan relative to other alternatives.

Sincerely,

Form Letter 2

Response to Comment 1
Please refer to General Responses 1 and 10

Response to Comment 2
While no definition of “large scale commercial logging” is provided in the comment, it can be assumed that the comment relates to the overall quantity of harvesting. While the comment does not go directly to the contents of the EIR, or the analysis therein, the following response is provided.

The legislative mandate for the forest is to demonstrate sustainable and economic forest management. The economic component of this mandate requires the use of commercial logging operations. The timber harvest level under the ADFFMP is based on providing a varied landscape with a set of forest structures designed to support a viable research and demonstration program rather than a goal of a particular level of production. This analysis has resulted in a planned average annual harvest level of approximately 20 to 25 million board feet which is well below current growth. In addition, the commitment to monitoring and adaptive management will ensure not only that harvest does not exceed growth, but that other timber related resource conditions are on the correct trajectory to meet the stated management goals. Potential impacts to other resource values have been mitigated to “less than significant”.

Response to Comment 3
Please refer to General Response 9

Response to Comment 4
Please refer to General Response 11

Response to Comment 5
Please refer to General Response 7

Response to Comment 6
Please refer to General Response 14

Response to Comment 7
Please refer to General Responses 8, 2, 11 and 12

Response to Comment 8
Opposition to approval noted. Please refer to General Response 4

Response to Comment 9
Please refer to General Response 13

Response to Comment 10
Please refer to General Response 11

Response to Comment 11
Please refer to General Response 14

Response to Comment 12
Please refer to General Response 4. Alternative E was not "rejected", and was thus included in the alternatives analysis in both the DEIR and RDEIR. The DEIR and the RDEIR included an in-depth comparison of the proposed project alternative and the other project alternatives, including E, as required (CCR §15126.6). Some elements of several of the final alternatives under consideration (A, D, E, and F; see DEIR Table VI.1 or RDEIR section II.5 and Table II.4) may not be consistent with the Public Resources Code, regulations, or Board policies. A clear discussion of the statutory framework from which the state forests are managed is contained in Section II (Introduction) of the DEIR and a

detailed compilation of relevant statutes, regulations, and Board policies is provided in DEIR Appendix 5.

Response to Comment 13
Please refer to General Response 6

Response to Comment 14
Please refer to General Response 5

Response to Comment 15
Please refer to General Response 3

F-3

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

RE: Jackson Demonstration State Forest Draft EIR and Management Plan

Dear Mr. Gentry,

1 As in any agricultural pursuit, flexibility, best available science and a wide array of available tools are all necessary for the best results. Current management of Jackson Demonstration State Forest has been guided by the 1983 management plan and the results speak for themselves. I support alternative B and believe that it provides the flexibility and proven track record to guide the management of JDSF into the future.

2 For the past few years, due to the lawsuit, there has been no management of any significance on the state forest. There has been minimal road maintenance, no stream restoration, no timber stand improvement, no research, and limited recreational opportunities. There has been a significant loss of infrastructure, while state and local government have lost millions of dollars in revenue. The impacts to state and local government, JDSF, and the local workforce due to this shut down have been significant. It is time to get JDSF back into production.

JDSF is the largest forest in the state forest system. Public Resources Code (PRC) 4631-5658 provides authority for the administration and operation of this forest. The state forest system is managed for research and demonstration of sustainable timber harvesting. In the absence of new legislation, not harvesting on the forest is no alternative.

3 I strongly feel alternative B is the alternative that give managers the flexibility needed to properly manage JDSF. I also feel the Board of Forestry needs to do all in its power to insure the forest is back in production as soon as possible.

Sincerely,

Form Letter 3

Response to Comment 1
Support for Alternative B is noted.

Response to Comment 2

The Board recognizes the fact that the loss of revenue in recent years has precluded some management activities. In particular, an absence of significant revenue has reduced the level of road maintenance and improvement, as well as other aspects of forest management, such as timber stand improvement, stream restoration, research, and recreation. However, some level of management associated with these activities has occurred.

The Board also recognizes that there has been a loss of tax revenue and jobs associated with the absence of timber production. The Board agrees that it would be highly beneficial for the State Forest to resume management activities, so the Board is working actively to certify the EIR and approve a management plan.

Response to Comment 3

Support for alternative B is noted. Active management is required by the legislative mandate that created Jackson Demonstration State Forest. The Board supports a balanced, multiple use concept and sustained production of high quality timber products.

F-4

George D. Gentry, Executive Officer
Board of Forestry & Fire Protection
P.O. Box 944246
Sacramento, Ca 94244-2460

Mr. Gentry:

1- The reason for my letter is to request that you accept the Proposed Alternative B Environmental Impact Report and return Jackson Demonstration State Forest to active status. The shut down of Jackson Demonstration State Forest has had a devastating effect to our community and our county. Families have lost jobs, small businesses are hurt, taxes and income are way down.

2- I support the past management of Jackson Demonstration State Forest. I believe that the benefit of a productive JDSF will spread throughout the North Coast community. The EIR projects if JDSF resumes active status it will sustain 240 timber jobs paying $7,600,000 in wages and 240 support jobs producing an additional $4,700,000 in wages.

3- I truly hope you will adopt the proposed Alternative B EIR and return Jackson Demonstration State Forest to an active production forest.
Thank you for your consideration.

Sincerely,

Form Letter 4

Response to Comment 1
Support for Alternative B noted. The Board agrees that it would be highly beneficial for the State Forest to fully resume management activities, so the Board is working actively to certify the EIR and approve a management plan. The Board recognizes that the lack of active management and timber production in recent years has resulted in the loss of jobs and revenue for local communities and the State.

Response to Comment 2
Support for the past management noted. A significant level of sustainable timber production will continue at JDSF. The economic setting and the economic impacts of various levels of harvest, in terms of estimated employment and local revenues, are discussed in section III.6.2 of the DEIR. The resumption of timber production is expected to have a positive economic impact in the region.

Response to Comment 3
Active management is required by the legislative mandate that created Jackson Demonstration State Forest. The Board supports a balanced, multiple use concept and sustained production of high quality timber products.

F-5

George D. Gentry, Executive Officer
Board of Forestry and Fire protection
P.O. Box 944246
Sacramento, CA 94244-2460

Dear Mr. Gentry:

I would like to comment of the Draft Environmental Impact Report for Jackson Demonstration State Forest.

1, 2, 3, 4 Alternative C-1, the proposed project, permits too much logging and provides too little protection for old-growth forest, wildlife habitat, and watercourses.

I urge you to revisit the environmental impact report for Jackson Demonstration State Forest, and develop and alternative that would:

5 - restore the natural forest ecosystem;
6 - safeguard fish and wildlife habitat;
7 - protect water quality;
8 - eliminate clearcutting as a management tool;
9 - cordon off old growth from harvest; and
10 - end herbicide use

11 Also, the Board of Forestry should extend the public comment period another 60 days. The complexity and sheer volume of the 1500-page EIR makes it difficult for the public to respond during the too-brief period allowed for public comment.

Thank you,

Form Letter 5

Response to Comment 1
The legislative mandate for the forest is to demonstrate sustainable and economic forest management. The economic component of this mandate requires the use of commercial logging operations. The timber harvest level under the ADFFMP is based on providing a varied landscape with a set of forest structures designed to support a viable research and demonstration program rather than a goal of a particular level of production. This analysis has resulted in a planned average annual harvest level of approximately 20 to 25 million board feet which is well below current growth. In addition, the commitment to monitoring and adaptive management will ensure not only that harvest does not exceed growth, but that other timber related resource conditions are on the correct trajectory to meet the stated management goals. Potential impacts to other resource values have been mitigated to “less than significant”.

Response to Comment 2
Please refer to General Response 8

Response to Comment 3
Please refer to General Response 12

Response to Comment 4
Please refer to General Response 11

Response to Comment 5
Please refer to General Response 2

Response to Comment 6
Please refer to General Response 11, 12

Response to Comment 7
Please refer to General Response 11

Response to Comment 8
Please refer to General Response 10

Response to Comment 9
Please refer to General Response 8

Response to Comment 10
Please refer to General Response 7

Response to Comment 11
Please refer to General Response 5

F-6

Dear Members of the Board:

1- Jackson State Forest is a valuable public resource that belongs to all Californians. I am very concerned that Jackson Forest has not been managed in a way that adequately balances the needs of fish and wildlife and the desires of most Californians with the Department's desire to log the forest.

2- Jackson State Forest is a unique resource in the redwood ecosystem. It is situated in the central part of the coast redwood range, where there is no national forest with redwoods, and where redwoods are preserved at the lowest rate of their entire range. In the area that includes Mendocino, Sonoma and Marin counties, only 1.36 percent of redwoods are protected in parks and reserves according to an analysis published by the Save-the-Redwoods League in 2000. It is this context that brings a heightened urgency to management issues at Jackson.

3- I strongly urge you to adopt Alternative F, the "Older Forest Emphasis" plan for management at Jackson. Given the legislative mandate under which the forest is operating, Alternative F balances a high level of environmental protection with a carefully implemented timber production program. A gently applied timber management program will be consistent with the existing legislative mandate while greatly reducing the long-running controversy at Jackson. At the same time, regionally scarce fish and wildlife habitat will be enhanced. Alternative F strikes a good balance.

4- For the past ten years there has been a high degree of dissatisfaction with Jackson's management. I urge you to adopt the meaningful reforms that are outlined Alternative F, and finally put the controversy to rest.

Sincerely,

Form Letter 6

Response to Comment 1
The Board has developed an alternative that strives to balance the concerns of all Californians while remaining consistent with the legislative mandate and Board policy for the state forest system. The management plan is designed to balance the demonstration and research, production of timber products, and the desires of the public, while improving the overall health and ecosystem function of the forest.

Response to Comment 2
Clearly, there is a desire amongst many citizens to protect all redwood forests. While JDSF will not be managed as a park or reserve, one of the primary goals of the ADFFMP is to improve the overall health and ecosystem function of the Forest (see General Response 2).

In their analysis, Save-the-Redwoods League utilized the four categories of management or protection status recognized by the national Gap Analysis Program (GAP) of the US Geological Survey Biological Resources Division:

Status 1. An area having permanent protection from conversion of natural land cover and a mandated management plan in operation to maintain a natural state within which disturbance events (of natural type, frequency, intensity, and legacy) are allowed to proceed without interference or are mimicked through management.

Status 2. An area having permanent protection form conversion of natural land cover and a mandated management plan in operation to maintain a primarily natural state, but which may receive uses or management practices that degrade the quality of existing natural communities, including suppression of natural disturbance.

Status 3. An area having permanent protection from conversion of natural land cover for the majority of the area, but subject to extractive uses of either a broad, low-intensity type (e.g., logging) or localized intense type (e.g., mining). It also confers protection to federally listed endangered and threatened species throughout the area.

Status 4. There are no known public or private institutional mandates or legally recognized easements or deed restrictions held by the managing entity to prevent conversion of natural habitat types to anthropogenic habitat types. The area generally allows conversion to unnatural land cover throughout.

The quoted statistic of 1.36% protected in the central coast region includes only areas protected at the GAP 1 level. For their planning purposes Save-the-Redwoods League considers both GAP 1 and GAP 2 as the protected parks and reserves. The area they consider “protected” under this definition is 6.72%. Save-the-Redwoods League also acknowledges that additional land has been protected in Mendocino County at both the GAP 1 and Gap 2 level (e.g. Big River) and GAP 3 level (Garcia River Forest project).

The Board recognizes the regional importance of JDSF and the value of reserves and parks for providing functional ecosystems. However, it is beyond the scope of this EIR to address the adequacy of the reserve system. JDSF may not meet the criteria used by Save-the-Redwoods League to define “protected”, but it is protected at the GAP 3 level from conversion to other land uses and will remain a redwood forest. The ADFFMP calls for harvest levels set well below growth, so there will be an increasing inventory of larger, older trees. All remaining Old-growth will be protected as described in General Response 8. The ADFFMP designates 33% of the forest to the retention or development of late seral conditions by either no harvesting, to allow stands to develop in a non-

managed state, or by understory thinning, selective harvest or other management activities designed to promote late seral characteristics (see General Response 9). The management plan also calls for increased emphasis on protecting and enhancing the associated resource values, such as aquatic and wildlife habitat (see General Response 11 and 12). The DEIR found that after mitigation the proposed project (Alternative C1) would have less that significant adverse environmental impact for all analyzed resource values and would have either no impact or beneficial impact on many resource values. The ADFFMP incorporates increased protection measures and a reduced timber harvest level, so no significant adverse impacts are expected.

Response to Comment 3
Support for Alternative F noted. The ADFFMP has been developed by blending the elements and management strategies of several Alternatives, including Alternative F. This includes accelerated implementation of the Road Management Plan, a reduction in the use of even age management and clear cutting, a reduction in the planned timber harvest level, an increase in the area dedicated to development of late-seral forest conditions, an increase in resource protection and restoration measures, such as snag retention and LWD placement, and a management emphasis on research, demonstration and education. One example of the research and demonstration emphasis will be to test the cost and effectiveness of the riparian zone management approaches contained in Alternatives C1 and D-F. The results of these experiments will be utilized as part of the adaptive management process defined in Chapter 5 of the ADFFMP.

Significant impacts to fish and wildlife habitat are not expected due to management as approved by the Board. Please see DERI Section VII.6.1 and VII.6.6 and REIR III 6.2 and II.6.7 for the analysis of these resources (see also General Response 11 and 12).

Response to Comment 4
Unfortunately, there is no alternative that “will finally put the controversy to rest”. The Board has developed an alternative that strives to balance the concerns of all Californians while remaining consistent with the legislative mandate and Board policy for the state forest system. The ADFFMP is designed to balance the demonstration and research, production of timber products, and the desires of the public, while improving the overall health and ecosystem function of the forest.

F-7

California State Forestry Board
P.O. Box 944246
Sacramento, CA 94244

Dear California State Forestry Board,

1 As a supporter of Defenders of Wildlife and California's great natural heritage, I strongly urge you to adopt Alternative F, the "Older Forest Emphasis" plan for management at Jackson Demonstration State Forest.

2 Alternative F balances a high level of environmental protection with a carefully implemented timber production program. Such a gently applied timber management program would be consistent with the existing legislative mandate. Alternative F would also enhance fish and wildlife habitat, which is now scarce in the region.

3 Jackson Demonstration State Forest is a unique resource in the redwood ecosystem. It is situated in the central part of the coast redwood range, where there is no national forest with redwoods, and where redwoods are preserved at the lowest rate of their entire range.

In the area that includes Mendocino, Sonoma and Marin counties, only 1.36 percent of redwoods are protected in parks and reserves according to an analysis published by the Save-the-Redwoods League in 2000. The forest's special place in the redwood ecosystem makes its proper management all the more important for future generations of Californians.

I urge you to adopt the meaningful reforms that are outlined in Alternative F. Thank you for considering my comments.

Sincerely,

Form Letter 7

Response to Comment 1
Support for Alternative F noted. The Board has developed an alternative that strives to balance the concerns of all Californians while remaining consistent with the legislative mandate and Board policy for the state forest system. The ADFFMP is designed to balance the demonstration and research, production of timber products, and the desires of the public, while improving the overall health and ecosystem function of the forest.

Response to Comment 2
The ADFFMP has been developed by blending the elements and management strategies of several Alternatives, including Alternative F. This includes accelerated implementation of the Road Management Plan, a reduction in the use of even age management and clear cutting, a reduction in the planned timber harvest level, an increase in the area dedicated to development of late-seral forest conditions, an increase in resource protection and restoration measures, such as snag retention and LWD placement, and a management emphasis on research, demonstration and education. One example of the research and demonstration emphasis will be to test the cost and effectiveness of the riparian zone management approaches contained in Alternatives C1 and D-F. The results of these experiments will be utilized as part of the adaptive management process defined in Chapter 5 of the ADFFMP.

Significant impacts to fish and wildlife habitat are not expected due to management as approved by the Board. Please see DEIR Section VII.6.1 and VII.6.6 and REIR III 6.2 and II.6.7 for the analysis of these resources (see also General Response 11 and 12).

Response to Comment 3
Please refer to Form Letter 6, Response to Comment 2. See also General Response 15.

F-8

George D Gentry
Executive Officer
Board of Forestry & Fire Protection
P.O. Box 944246
Sacramento, CA 94244

Dear Mr. Gentry:

1 I urge the California Board of Forestry to select a management plan that accounts for the research and demonstration of sustainable timber harvesting while generating revenue for the state. Previous management of the forest transformed the cutover timberland in 1947 to a premier second growth forest.

2 Over the past few years, there has been no management of significance on the state forest. There has been minimal road maintenance, so stream restoration, no timber stand improvement, no research, and limited recreational opportunities. As a result, state and local governments have lost millions of dollars in revenue that provides for the management of other state-owned forests, state nurseries, forest practice regulation, and the California Forest Improvement Program.

It is ludicrous to shut down a sound revenue-generating forest that provides key information on watershed function and sustainable resource management. The research conducted at JDSF is world-renowned and contributes to improved forest practices statewide.

3 Active management is how resources are protected and revenue is generated. The state of California is a massive consumer of forest products, with the most cumbersome and burdensome environmental framework by which that active management is guided. Many of the best management practices have been developed and demonstrated at JDSF.

4 I urge the California Board of Forestry to consider a management plan that includes research and demonstration of scientifically based maximum sustainable timber harvesting while providing increased knowledge and expertise as well as much needed revenue for the state of California.

Sincerely,

Form Letter 8

Response to Comment 1
Support of the previous management program noted.

Response to Comment 2
The Board recognizes the fact that the loss of revenue in recent years has precluded some management activities. In particular, an absence of significant revenue has reduced the level of road maintenance and improvement, as well as other aspects of forest management, such as timber stand improvement, stream restoration, research, and recreation. However, some level of management associated with these activities has occurred.

The Board also recognizes that there has been a loss of tax revenue and jobs associated with the absence of timber production.

The State Nursery Program and Forest Practice Program are no longer funded by revenue from the State Forest Program.

Response to Comment 3
The Board agrees that it would be highly beneficial for the State Forest to resume management activities, so the Board is working actively to certify the EIR and approve a management plan. The Board agrees that JDSF has played an important role for research and contributed to the development and demonstration of improved forest practices.

Response to Comment 4
As defined in PRC 4639, “Management” means the handling of forest crop and forest soil so as to achieve maximum sustained production of high quality timber products while giving consideration to values relating to recreation, watershed, wildlife, range and forage, fisheries, and aesthetic enjoyment. The ADFFMP is designed to balance the research and demonstration mandate, maximum sustained production of timber products, and consideration to the values of the other resources listed above. The Board supports a balanced, multiple use concept and sustained production of high quality timber products.

F-9

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

Dear Members Board of Forestry,

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

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

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

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

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

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

Sincerely,

Form Letter 9

Response to Comment 1
Support for alternative G noted.

Response to Comment 2
The future use of the clearcut silvicultural method has been limited. The use of this stand management method is limited to no more than a few hundred acres per decade, primarily for research or very difficult stand regeneration circumstances (RDEIR Page II-9). The Board recognizes that the scope of potential future research is greatly enhanced by the availability of a broad range of stand and habitat conditions. Significant impacts due to the limited use of clearcutting are not expected to occur. The Board concurs that additional research on the recovery and restoration processes within forests is both needed and beneficial. Future research and demonstration will include this form of examination. Please see DEIR Section VI and REIR Section III for an assessment of potential environmental impacts as the result of the future management of JDSF. See also General Response 10.

Response to Comment 3
Many of the recommendations of the Mendocino Working Group have been incorporated into Alternative G, including interim harvest limitations and the formation of a JDSF advisory committee. The commenter does not describe the form of destruction that is asserted will occur with the limited use of clearcutting that has been proposed. The potential for impacts to occur as the result of timber harvest, including the use of even-aged management, have been considered, and significant impacts are not expected to occur.

Response to Comment 4
Support for the interim period and advisory committee noted.

Response to Comment 5
The JDSF advisory group will provide the Board and the Department with advice concerning both implementation and policy issues related to the future management of JDSF. This group is expected to review and comment upon many of the proposed harvest plans for the interim period, except those for which the Board has determined that review is not required, either due to the implementation of interim harvest standards or specific research proposal as is the case in the South Fork of Caspar Creek (see RDEIR Table II.3). Alternative G retains future planning options, including options related to restoration, habitat, and recreation. The management plan is expected to remain in effect for the next 10 to 15 years, and the Board anticipates reconsideration of the management plan following receipt of input from both the JDSF advisory committee, the general public, and the Department following the interim period.

F-10

Dear Members of the Board:

Thank you for reorienting the management at Jackson Demonstration State Forest toward scientific research about a broad range of forest
1- ecosystem issues. We applaud that the new goals include a focus on developing information for small landowners and those who are interested in conservation and restoration as I am.

Please keep in mind that Jackson is the areas only significantly sized public redwood forest. Low-impact outdoor activities such as hiking, camping, birding, and mushroom hunting are generally compatible with
2- research on conserving and restoring forestland. Because the region does not have ready access to the vast expanses of public forestlands available in other parts of the state, Jackson is a vital recreation resource.

While your new Alternative G does recognize the importance of
3- recreation, I urge you to take the next step as soon as possible and complete a comprehensive recreation plan that identifies key assets and locations and reasonable means for the public to access them.

The idea of an Older Forest Structure Zone (OFSZ) is a good one, but the boundaries should be revised and expanded. The OFSZ fails to include many areas that currently have large, old trees, for instance
4- near West Chamberlain Creek and Brandon Gulch. The region is so deficient in older trees, their location on Jackson should be the most important factor in designing the OFSZ. The Late Seral Development Areas within the OFSZ should also be expanded to ensure that significant intact areas of existing older forest remain for research and as reference stands.

Even though research will be the focus at Jackson, be sure to consider the regional context before allowing experiments that diminish a forest
5- or watershed resource. It could seem reasonable to experiment with less than standard watercourse protection but, in a region where the National Oceanic and Atmospheric Administration (NOAA) has changed the listing of Coho salmon from threatened to endangered, assisting the recovery of the species is a higher responsibility.

Again, thank you for taking Jackson Forest in a new direction. With careful attention to the guidance you receive from the various advisory groups, Jackson can finally become the asset it should be.

Form Letter 10

Response to Comment 1
Support for Alternative G noted.

Response to Comment 2
The Board concurs that JDSF is an important recreational resource.

Response to Comment 3
Support for comprehensive recreational planning is noted. The ADFFMP includes a plan for future management of the recreational resources within the State Forest, including a modest increase in recreational facilities. The ADFFMP also includes provisions for consultation with local recreational user groups. Please see DEIR Section VII.14 for an analysis of potential recreational impacts and an overview of recreational provisions of the ADFFMP. See also General Response 14.

Response to Comment 4
No specific environmental concern is expressed other than a desire to see the older forest structure zone and late seral development areas expanded. A reasoned response to a specific environmental concern is not possible. The intent of the older forest structure zone is to develop habitat, to promote connectivity between old-growth groves and late seral development areas, and to promote structural characteristics associated with older forests. It is also the intent of the Board that the management of the Forest balance watershed and habitat values with other forest management benefits in compliance with existing legislation and Board policies for the state forest.

The Board did not intend to extend the older forest structure zone or late seral development areas to include all large trees within the Forest. The terms "large" and "old" are subjective, but the management plan provides for the retention of large old-growth trees and old-growth trees with specific structural characteristics. Most of the forest area included in the older forest structure zone and late seral development areas is second -growth forest that is currently either even-aged or uneven-aged, depending upon harvest and management history. All of this area is valuable habitat, and is expected to develop into a highly variable uneven-aged condition with structural characteristics of value to wildlife species, including many species normally associated with older forests. There is no inventory of "old trees" per se for the region or the assessment area, since the term "old" is not defined. The value of forest stands as habitat is more a matter of structure than the size or age of individual trees within those stands, though size is one component of structure. An estimate of habitat distribution within JDSF and the assessment area is provided in DEIR Map Figures J and K. See also General Response 8 and 9.

A significant area of second-growth forest that has not been re-harvested is encompassed by the late seral and older forest development areas across JDSF.

Response to Comment 5
The potential for impacts to listed fish species has been considered. Significant cumulative impacts are not expected to occur (DEIR Section IV.6.1 and Section VIII). It is the Board's intention to promote continued recovery of the aquatic ecosystems on JDSF. Demonstration and experimentation will be conducted with this intention, but there remains a considerable degree of uncertainty in the relationship between protection mechanisms, restoration efforts, and the aquatic systems. JDSF can help add to the body of knowledge concerning restoration and protection. The Board does not propose to apply "less than standard watercourse protection". At a minimum, the protection standards specified in the ADFFMP will apply. See also General Response 11.