

IV.5 Individual DEIR Mailed Comments P-1 to P-75

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.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-1

JOHN P. ANDERSEN
REGISTERED PROFESSIONAL FORESTER #2503
327 PARK STREET, FORT BRAGG, CA 95437, 707-962-2820
JOHNANDERSEN@MENDOCO.COM

November 8, 2005

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

Re: JDSF Administrative Draft Environmental Impact Report (ADEIR)

Dear Mr. Gentry,

After reviewing the ADEIR, it is painfully obvious that CDF and JDSF have considered every possible alternative, management implication, and potential impact of the future management of JDSF with the recent release of the ADEIR. It is clear the staff at JDSF have done a superior job of managing this forest and plan on doing nothing less in the future. Please consider the ADEIR complete and adequate. Thank you for your time in this matter.

Best Regards,



John Andersen
RPF #2503

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AND FIRE PROTECTION

Mailed Letter P-1

Response to Comment
Comment noted.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-2

December 10, 2005.

George Gentry
Secretary
State Board of Forestry

Dear George,

I sure want to get my digs in for the record on the Jackson State Forest matter. I hope that this letter might particularly be brought to the attention of your timber industry oriented members of the board.

In 1952 I drove the Coast Route #1 past the active Company sawmill at the ocean edge in Casper Cove. The mill shut down that winter. In 1972 I had the contract with the State for the cruise of the State Forest segment that went to the Union Lumber Company in trade for the Mendocino town headlands. A deep promise was made by all three parties (Private and the two State agencies) that this relinquishment was a one time affair and never again. So far in 32 years it has held up. Is that promise a matter of record? It should be.

A failure I made years ago in those early 1950s was not to get some Notarized Testimony from the personal contacts I had with the San Francisco Casper Lumber Company Attorney, Bill Doyle, and the Fort Bragg - Casper properties caretaker Harry Wakefield about what transpired when the Company sold their main holdings to the State for \$2.50/acre, the promise of the name 'Jackson', and a program to establish a demonstration timber growing Forest for the Redwood Region. I enjoyed working with 'run-out-of-job' Casper Company Bull-Buck Von Gabbert when we had lots and lots of days work together for two to five years later. But I didn't try to get such records and so there.

As to Jackson State Forest, I have thought that Gene Sindel or Emory Escola might have left some personal notes that could be researched which would indicate intent of the time of the State transfer in the late 1940s.

It seems to me now and from my personal evidence I have had in files now thrown out that the practical sole purpose of the family in practically gifting the property to the State was a striving to find good Redwood young growth management for maximum utilization of lumber while respecting the multiple use features of the Redwood Region of California.

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Page 2, State Board of Forestry

This current push to preservation is by, it seems, just everyone including

the big owners spinning off outlying holdings (local examples being the Del Norte Mill Creek holdings, Barnum in the upper reaches of Redwood Creek),

the Parks and wildlife people and organizations with emotional pitches to their vast majority of contribution fund givers from all over the nation,

2 the what I call "Hold People" , both government and private and particularly elected politicians who go the way of the wind, and who can't figure out that life is a continuing ever changing Darwinian concept and 'endangered species' is a ploy for time,

the allied efforts of Fort Bragg locals to stop logging completely for what I see as purely NIMBY reasons,

the emphasis of the University Resource Department with its view of the whole ecosystem as equal and timber production for payroll and other society benefits as not having a dominant place as it has had in the past.

Even the Thanksgiving Day newspaper article with a preservationist slanted view in the Chronicle about the use of our National Forests is so biased. Such words need refuting.

3 My observation now is to wonder at Bernie Agrons' opinion, one time expressed to me. "if it is growing, there will be a market for it." If we don't plan for such a market and establish the right zoning and established public policy for such a market in land use planning, where will our growing trees go? The preservations gleefully say to "Old Age".

4 In resource management are we finally over the period of the past expansion of North America with a philosophy of need for local population growth and community economic benefits? Most reasons for people to have different view points are valid but others such as the premise of the shortage of Spotted Owls I feel can be a dishonest emotional ploy to the gullible public.

5 I don't think that anyone in our active days was much concerned that such an effort as now needed might be necessary to stand up for our Industrial Forestry beliefs. A present service oriented economy is not sufficient excuse to forget the growth of trees.

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Page 3, State Board of Forestry

Just in my limited year 2005 traveling throughout California from San Diego to Prairie Creek and from along Coast to the Mother Lode, I see wood house after wood house being built. Recently, I had a grand personal tour of Brown's Opening up out of Long Barn near Sonora and saw one of the prettiest 1,000 acres working forests I have ever noted. I think Jackson State is equally thrilling.

6 If we can manage California in our own backyards, why go to Indonesia and Canada, Siberia or the Amazon to do our log procurements? I think it is evil to reach to depletion of foreign cut-without-care Forests to sustain the need for lumber in the United States or locally in California.

7 This message has got beyond solely Jackson State Forest problems but the whole situation of directions is troubling to me. I have a long held opinion of Industrial timber management being a society benefit to our current population. Mulford, Baker, Fritz, Oscar Evans, Swift Berry, and other mentors of my past were each inspiring and taught me my values.

8 Could a new committee with a dedicated narrow interest in viewpoints such as mine be respected in State Board testimony about California's timberland management? I can think of a number of similarly interested people. I think the SAF, ACF, and the Licensed Forester organization have too broad viewpoints. In 1972 the few members of the California ACF pushed hard, gave a fee to Francis Raymond and almost singularly got our Forestry License Bill through. A bigger push by a broader coalition got the new 1972 Forest Practice Act enacted. Now we need some forthright policy establishment, maybe with 100 year projections, square with growing timber needs.

What can I do now as an old non-mobile guy with fifty four years of local observation, and five working years elsewhere in California, but with only a few years left? Say and I will try.


Bob MacDougall
105 Barbara Street
Ukiah CA 95482
<rtmkvm@pacific.net

Copy: Forest Tilley - member JSF Committee; Present management of Jackson State Forest; Berkeley Dean Paul Ludden; Mike Janis of Mendocino Woodlands Company

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-2

Response to Comment 1

The legislation that provided for establishment of the State Forest makes it very clear that demonstration of maximum sustained timber production is one of the primary purposes of forest management (see General Response 2).

Response to Comment 2

The Board recognizes that there are many people and organizations that support a more preservation-oriented approach to forest management. The Board supports a balanced, multiple use concept and maximum sustained production of high quality timber products.

Response to Comment 3

See response 2 (above).

Response to Comment 4

Comment noted.

Response to Comment 5

A significant level of sustained timber production will occur at JDSF. The Board supports efforts to grow and utilize trees and timber products.

Response to Comment 6

Comment noted. Continued production from the forests of California is encouraged by the Board.

Response to Comment 7

Comment noted. The Board agrees with this comment.

Response to Comment 8

Comment noted. Both JDSF and owners of other large, timbered properties that propose to harvest forest products, are required to establish a long term sustained yield, projected over a 100-year time period.

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P-3



ASSOCIATED CALIFORNIA LOGGERS

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January 19, 2006

Board Of Forestry And Fire Protection
P.O. Box 944246
Sacramento, CA 94224-2460

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Members Of The Board:

Our association of contract loggers and log truckers has a long-standing interest in Jackson Demonstration State Forest. The multitude of timber stand conditions that have been created by the Forest's management have made it a valuable research base that helps us advance the quality of our workmanship. The timber sale program of the forest is, of course, an important economic support ingredient for Mendocino County's logging and sawmill infrastructure. Its economic impact is felt well beyond its home county.

1 We think the continuation and evolution of past management as proposed by Alternative B is the appropriate path to follow.

"The Jackson State Demonstration forest was acquired nearly 60 years ago to serve as a research, education, and demonstration facility for sustainable forest management practices. Along with the forestry mission, it also provides a landscape for environmental and biological research and recreation. Since 1947, the Jackson State Demonstration Forest has been managed by the Department of Forestry under four different management plans approved by the Board of Forestry with each new plan reflecting the development of new progressive management concepts and new resource protections. The forest also provides considerable revenues that benefit all Californians by funding the Urban Forestry Program, State Nurseries, California Forest Improvement Program, Forest Pest Management, and Watershed Assessment."

This statement by Governor Schwarzenegger is from his veto message concerning SB 1648. He notes further that multiple use of assets is always preferred where the mission and purpose are not compromised. We think Alternative B offers the best opportunity for multiple use balance as an evolution from prior management plans.

2 We are concerned that the management of the Jackson Demonstration State Forest under the other alternatives allocates too large an acreage to late seral stand development at the expense of other stand types. One of the major assets

Progress for Loggers & Logging

FINAL EIR FOR JDSF MANAGEMENT PLAN

of the Forest is its multitude of forest types that provide a setting for almost any type of research that's needed. More acreage is appropriate to a category that permits active management research rather than the more passive natural process investigations. Many of those investigations can be carried out on State Park lands in the vicinity. Retaining Jackson Forest's diversity for more dynamic research projects as well as a reasonable volume of commodity production acreage is important to research and economic success. Certainly, research in the manipulation of stream protection zones is an important area of research that should not be limited by late seral objectives or constraints.

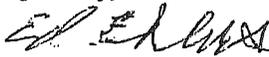
3 We think Alternative B with its updated mitigation measures is a more desirable management system and urge the Board to adopt it.

4 We also think that those lands that are ultimately identified for late seral and other "reserved" areas may need manipulation to survive and prosper. Practical access needs to be available and recognition of this need and supporting provisions should be included in the management plan and the EIR document.

5 In summary, we think Alternative B offers the best mix of areas and techniques for protecting and expanding the multitude of stand types and their availability for research purposes. It needs to be strengthened by providing policy support for practical access to permit the manipulation of "reserved" areas to help assure they survive and prosper. While the staff of the Forest has had some difficulty in describing the advances and benefits they have created, an inspection of the Forest indicates their management and the plans that have guided them have created very satisfactory results. Continuation of existing management practices should continue producing desired results.

6 Alternative B also has the advantage of permitting the moving of the annual cut on the Forest to a volume that is closer to the growth rate. This has the advantage of creating an economic climate in which the infrastructure that is necessary to bring success to the Forest can continue to be available. It will also permit the achievement of the goals of the other programs mentioned above by the Governor in his veto message on SB 1648.

Respectfully,



Ed Ehlers, Executive Director
For The Association

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-3

Response to Comment 1

The stated preference for Alternative B is noted.

Response to Comment 2

The allocation of stand types at JDSF is based upon consideration of the enabling legislation, Board policy, and existing regulation. The planned allocation of forest area to late-seral forest protection and development does not preclude the development of a vast array of stand conditions that are suitable and available for demonstration of timber production and other forms of active management research. Alternative G and the ADFFMP stress the importance of structural diversity on the Forest to support a wide range of research and demonstration.

As currently planned, a significant level of timber production will occur within the Forest on an annual basis. The designation of riparian zones as late-seral development areas does not preclude timber production and other forms of research, though the designation may limit the range of research that is possible.

Response to Comment 3

Please see response 1 (above).

Response to Comment 4

The management plan includes provision to actively manage areas designated for late seral development. The Board recognizes the role that active management can play in acceleration of these forest structures and characteristics. The designation of these areas does not preclude maintenance or creation of access for management purposes.

Response to Comment 5

Comments noted. The Board concurs that the Forest has been well managed in most respects. Most of the forested area of JDSF, including reserves, stream zones, and areas designated for late-seral forest development, remain available for management that will help create, maintain, or enhance the values for which those areas were designated.

Response to Comment 6

Comment noted. The Board does not control the operating budget for the Forest. However, the Board supports the concept that the Forest be self sufficient, and develop sufficient funding to enable full implementation of the ADFFMP. Many of the programs mentioned in the Governor's veto message are now supported primarily by the General Fund.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-4

DARCIE MAHONEY, Licensed Forester
50995 Greenwood Road • Elk, CA 95643 • 707-577-1435

20 January 2006

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

Dear Mr. YG Gentry:

I have a brief recommendation to give regarding the EIR for Jackson State Forest.

While "Alternative D" is not perfect, it represents the views of a broad base of concerned and active citizens of the area and should be considered seriously

I believe Alternative D is the best compromise of local opinions and provides the best opportunity to resume management operations on JDSF.

Sincerely,



Darcie Mahoney
Licensed Forester #2397

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BOARD OF FORESTRY
AND FIRE PROTECTION

Mailed Letter P-4

Response to Comment

Comments and preference for Alternative D noted.

P-5

Monday morning Dec 12

Remailed
after a Xmas in San Diego
12/28/05
Remailed
1/25/05

Dear young George.

I offer congratulations to you for your present job.

I sent my letter by e-mail but am enclosing this with a personal hard copy. I can't help but think that in some of my points, I am echoing "old George" but I think, in total, my letter is far out for the times. But it is as I think

I recognize that you "Young George" can take no position but I do hope that my message may receive due notice and particularly to the industry oriented members of the Board.

Thank you

Bob Van Doyell

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BOARD OF FORESTRY
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Mailed Letter P-5

Response to Comment
Comments noted.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-6



CALIFORNIA
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January 28, 2006

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

Reference: Comments on Jackson Demonstration State Forest DEIR

Dear Mr. Gentry,

CLFA has reviewed the Draft Environmental Impact Report (DEIR) for Jackson Demonstration State Forest (JDSF). We are submitting these written comments to be considered by the Board as it moves toward a final EIR

1

CLFA supports the just restoration of forest management at JDSF, including the critical components of research and demonstration. Courts can rule for and against on issues of law, but they are not capable of assuming day-to-day responsibility for the burdens and complexities of forest land management. Stewardship, if it is to exist, rests with on-the-ground professional resource managers executing decisions based upon sound planning and clear management direction.

2

We believe that the preferred Alternative C1 represents a quantum leap in both management sophistication and environmental protection as compared to its 1983 predecessor. We support C1 because we believe that it is a skilled compromise on contentious environmental issues, while remaining responsive to legislative intent for JDSF to be a working, *demonstration* state forest.

World Turning

In the 5 years since the management program at JDSF was first halted by legal action, factors undermining the competitiveness and sustainability of California forestry have continued to intensify. These include increased costs for state regulatory permits, continued mill closings and employment losses in the forestry sector, and accelerating pressure on private timberlands to be converted to non-forestry uses.

Since 2001, forest management in both California and the United States has faced new structural challenges. One trend is for forest products companies to divest themselves of their holdings. An article in the *Journal of Forestry* (12/04¹) stated, "Most forest products companies now have real estate development divisions and are actively marketing properties." Although the article documents the situation in the US South, the

¹ "The Speculative Shadow Over Timberland Values in the US South." Wear, David N. and Newman, David H., *Journal of Forestry*, December 2004.

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trend is nationwide. Values for undeveloped forestland have rapidly appreciated. The price increases have frequently not been driven by traditional timber considerations but by competing land uses such as subdivision and development.

Indeed, the focus of many environmentalists has shifted in recognition of the emerging threat to open space and sustainable forestry. In May 2005, the *California Forest Futures*² conference in Sacramento brought together diverse stakeholders to discuss the situation in the Golden State. One impetus for the meeting may have been CLFA's *California Forestry 2050*³ white paper.

3 CLFA believes that growing pressures on the economic, ecological and social viability of California forestry comprise the best arguments as to why JDSF must be revived to meet the natural resource management challenges of our rapidly changing world.

4 Given the intensifying market pressures facing California forest landowners, the value of a dedicated public asset such as JDSF to conduct research, demonstrate a range of resource management approaches and to provide regional economic stability is greater than ever. Due to downsizing, restructuring and other competitive pressures, many entities that control private forestland today are not in a position to conduct forestry research. New and non-traditional owners may, in fact, have little knowledge of silvicultural prescriptions and their utility in achieving a variety of forest management objectives. This is where the renewed and ongoing work of JDSF can play a crucial role in helping to nurture long-term forest stewardship, especially in the redwood region.

Broken Promises of Rural Prosperity

CLFA recognizes that there are those who earnestly believe that sustainable forestry is not a worthwhile objective and that the best use of public policy with regard to forestry is to suppress it. CLFA respectfully disagrees. We believe that this view is shortsighted and fails to recognize the ecological and social benefits of encouraging forest landowners – large and small – to retain their lands as working forest greenbelts instead of converting them to rural subdivisions, non-forest commodity production, or other uses.

5 Forestry professionals argue not for the end of science but for the perpetual beginning of new understandings based upon vigorous and ongoing inquiry. We believe that JDSF's unique public assets *specifically acquired and set aside as a "working" demonstration forest* offer present and future Californians greater benefits under Alternative C1 than any of the others under consideration.

Although Alternative C1 offers comprehensive protection (if not improvements) for non-commodity resources and values such as threatened and endangered fish and wildlife, soils and aesthetics, we're also concerned with non-intrinsic aspects of sustainable forestry – social and economic factors. The DEIR includes important

² Website. <http://forestry.berkeley.edu/forestfuture>.

³ *California Forestry 2050: What do we want our forests to look like, and how do we get there?* California Licensed Foresters Association, 2003. Posted under http://www.cifa.org/whats_new.htm.

FINAL EIR FOR JDSF MANAGEMENT PLAN

discussions on Economic, Social and Community Effects⁴ as well as JDSF: Social and Economic Setting Mendocino County⁵.

The DEIS reports on the decline of the timber industry regionally, and in Mendocino County. It also documents a decline in visits to redwood state parks, and states:

From an economic perspective, the major implication is that visitation and tourism related employment for redwood forests will continue to be an important aspect of our redwood forests but will not be an economic growth sector for areas not close to the San Francisco Bay Area⁶. (Emphasis added)

6

The analysis supports what many professional foresters observe in the redwood region. Forest-sector jobs pay better and provide more community benefits.

One of the consistent claims by advocates for more redwood parks (including converting JDSF into more of a park status) is that recreation jobs will replace forestry jobs. The DEIS suggests this line of reasoning is more wishful than right⁷. Recreation jobs pay only 62% of what timber jobs pay. The DEIS goes on to state:

...at the regional level, a continued decline in the timber-based economy will not be offset by growth in economic activity associated with redwood parks or in other section of the tourism industry⁸.

Del Norte County is illustrative of the economic difficulties of a forested county that has gone through the transition from an old growth timber economy to a recreation economy in the absence of a significant young growth timber economy. Although it has some of the most impressive redwood parks in the world, its labor force has actually declined since 1997, and it still has the highest unemployment rate in the region⁹.

Foresters believe that a false dichotomy is set up when sustainable forestry is pitted against parks, as in pleas to "save" a forest such as JDSF by removing management. Managing a forest for commercial timber does not preclude opportunities to steward non-commodity, intrinsic resources on the same piece of ground. If this were

7

⁴ *Environmental Impact Report for the Draft Jackson Demonstration Forest Management Plan (JDSF DEIR)*, prepared by CDF for the California State Board of Forestry, December 2005, Part III, Section 5, pp. III 25-48.

⁵ JDSF DEIR, Part III, Section 6, pp. III 48-56.

⁶ JDSF DEIR, Page III-37.

⁷ JDSF DEIR, see Table III.13, "Employment and Revenue Effects of Various Timber Harvest Levels", Page III-55. Also see Table III 7, "Employment and Mean Annual Wage for Selection Occupations, North Coast, 2003 for data supporting the statement (Page III-41): "...each tourism type job pays only about 62% of the annual wages of a timber industry job."

⁸ JDSF DEIS, Page III-48. The paragraph continues, "Most of the tourism and recreation economic activity of the North Coast region is tied to overnight visitors who concentrate their activities along the coastline or on the Highway 101 corridor. Day use visitors to forests, both public and private, are a significant part of the quality of life of local residents and visitors but generate few new jobs or fees in the region."

⁹ JDSF DEIS, Page III-45.

so, why would JDSF, today after decades of timber harvest, have salmon-bearing waters and habitat for threatened species? Is this not sustainable?

8

We would also argue that with regard to recreation, the tradeoff between forestry/no forestry is also not a zero-sum game. We're not arguing against parks, but for JDSF. Recreation can, and does, coexist with resource management in the redwoods and all over the world. In a sense, sustainable forestry is about "saving" resources while at the same time deriving material benefits from them. Given its complexities, it can never be perfected. But its alternative, as documented in the DEIS, can produce a more bitter harvest.

9

History and Purpose of JDSF

Jackson Demonstration State Forest has deep roots in California forestry. In the 1940's, forward-thinking foresters such as UC Berkeley Professor Emmanuel Fritz championed the need for state leadership in helping forest landowners meet the challenge of the times: making a painful transition from old growth timber extraction to the sustained practice of forestry. Legislation authorized state acquisition of cutover lands to be used for research and demonstration purposes in close cooperation with the private sector.

JDSF is the largest and most productive of our system of state forests. (Working state forests such as JDSF are not to be confused with State Parks, which are lands set aside for preservation purposes.)

Since the 1950s, JDSF has been managed by the California Department of Forestry and Fire Protection (CDF). Demonstration forestry, including commercial timber harvest and a wide array of scientific studies, began in the 1960s and continued until the court-ordered freeze began in 2001. Currently, JDSF has a standing timber inventory of more than 2 billion board feet, with annual growth of approximately 65 million board feet¹⁰. Supporting rich biodiversity including threatened terrestrial and aquatic species, providing aesthetic beauty and respite, employment and forest products, JDSF is a public asset that many are extremely proud of. Ironically, its success has been too apparent, as the visible fruits of its legacy of sustainable forestry are coveted by some who believe that custodial status would be a better use for the land.

A "People's Forest" for 21st Century Challenges

Professor Fritz and his contemporaries in 1945 were spurred by concern about adequate regeneration and stocking control in cutover forests. These challenges have largely been met, in no small measure because of the contributions of JDSF.

CLFA argues, however, that today forestry – and California's quality of life – face an entirely new set of challenges. Rather than a lack of productivity of forestlands, we face their actual loss. **The question before us is, "Should California have a timber industry, or not?"** Foresters believe that most people of good will answer this question with a clear "YES!"

10

Of course there is disagreement about the particulars, which is where JDSF comes in. Its unique role as a demonstration forest means that scientists can seek answers to questions that are difficult to answer outside of a dedicated living laboratory. Today's questions are different than yesterday's, as tomorrow's will be different than today's. A

¹⁰ JDSF DEIR, Page III-8.

FINAL EIR FOR JDSF MANAGEMENT PLAN

constant is that JDSF is a place where answers can be found – if it is allowed to survive and given freedom to pursue. The alternative, as spelled out in the DEIR, is disturbing:

The demonstration mandate of the state forests includes demonstration of the long-term physical and financial viability of managing young forests. If the values of long-term forest management are not demonstrated to owners of small to mid-sized forest tracts, there is greater potential for these lands to be converted to other uses, and the economic, social and environmental impacts of expanding forest fragmentation could be magnified across the region¹¹.

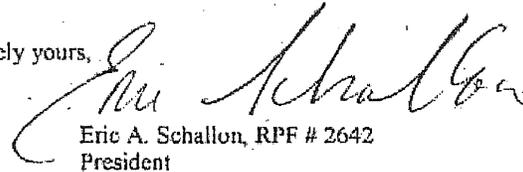
Ecology teaches us that everything is related. If small and medium sized parcels drop out of forest management in California, can the remaining large landowners be far behind? What will happen to those lands?

Conclusion

CLFA appreciates the opportunity to comment upon the JDSF DEIS. We've taken the opportunity to not just support Alternative C1, but to argue for a way of life and why its survival and future success is in the long-term interests of California.

Sustainable forestry may be counter-intuitive to some, in that it embraces social and economic considerations along with the ecological. We recognize that it is easier, sometimes, to bypass conservation to meet ideological demands for preservation. But JDSF is not a park, and shouldn't become one. Parks answer many profound questions, but are silent on others.

Sincerely yours,



Eric A. Schallon, RPF # 2642
President

Cc: Mr. Stan Dixon, Chairman, and Members, California State Board of Forestry.
Mr. J. David Colfax, Chair, and Members, Mendocino Board of Supervisors.
CLFA Board of Directors.
Ms. Hazel Jackson, CLFA Executive Director.
Mr. William Keye, CLFA Government Affairs Specialist.

The California Licensed Foresters Association, with approximately 750 members, represents the common interests of California Registered Professional Foresters. The Association provides opportunities for continuing education and public outreach to its membership, which includes diverse professionals affiliated with government agencies, private timber companies, consultants and the academic community. Governed by an elected Board of Directors, CLFA was established in 1980 – seven years after the passage of the landmark California Professional Foresters Law.

¹¹ JDSF DEIR, Page III-27.

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Mailed Letter P-6

Response to Comment 1

Comment noted. It is also the intent of the Board to return the management of JDSF to active status.

Response to Comment 2

Support for Alternative C1 noted. The Board agrees that Alternative C1, as well as other alternatives represent a significant advancement in forest management when compared to the 1983 plan. Over 20 years have passed, and our understanding of forest management and forest stewardship has changed. Alternative G and the ADFMP build on Alternative C1.

Response to Comment 3

The Board agrees with this statement. It is the Board's intention that the management of JDSF serve to inform the Board, public, and forest landowners.

Response to Comment 4

Comment noted. The Board fully supports continued research and demonstration that serves to inform and educate timberland owners. The Board directed the development of Alternative G to increase the management emphasis on research and demonstration.

Response to Comment 5

Comment noted. The management plan will continue the tradition of a working forest landscape that serves to demonstrate viable and sustainable forest management.

Response to Comment 6

Comment noted. The Board recognizes that Alternative C1 has potential to create and maintain a higher number of forest-sector jobs than alternatives that provide for a lower level of sustainable timber production (please also see General Response 14).

Response to Comment 7

The Board agrees with this statement.

Response to Comment 8

The Board generally agrees with this statement.

Response to Comment 9

The Board generally agrees with the statements made in this section of the letter.

Response to Comment 10

The Board agrees with this statement.

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P-7



Mendocino County Farm Bureau

Affiliated with the California Farm Bureau Federation and the American Farm Bureau Federation
Tyler Nelson, President Carre J. Brown, Executive Administrator

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BOARD OF FORESTRY
AND FIRE PROTECTION

January 25, 2006

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,

The Mendocino County Farm Bureau (MCFB) is a voluntary agricultural organization representing 1600 family and business memberships in Mendocino County. Our organization has a membership base made up of industrial and non-industrial timber landowners. A significant portion of those members will be affected by your upcoming decision regarding Jackson Demonstration State Forest (JDSF). The MCFB is pleased to see the Draft EIR and Management plan finally released. We strongly support the past management of JDSF. Through professional management this forest has been transformed from cutover timberland in 1947 to the premier second growth forest we see today.

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 has been guided by the 1983 management plan and the results speak for themselves. **We 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. The Mendocino County Farm Bureau strongly feels 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

303-C Talmage Road • Ukiah, California 95482-6417 • (707) 462-6664 • Fax: (707) 462-6681

FINAL EIR FOR JDSF MANAGEMENT PLAN

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

Much consternation is generated when the term even-aged management comes up. This silvicultural treatment includes seed tree, shelterwood, two-age, variable retention, and clearcutting. Even-aged management is limited to an average of less than two tenths of one percent of the land base per year, not a significant issue. Clearcutting is only used for research purpose and areas with regeneration problems.

4

Herbicide use on JDSF is very limited and a very contentious issue. Forest managers need to study the impacts of these applications and monitor the results. Demonstration projects on JDSF have the potential to find alternative effective ways to deal with such things as invasive exotic plants, a serious issue in the redwood region.

5

There are over 95,000 acres of old growth redwoods preserved in the redwood region. On JDSF there is a little less than 500 acres and the Farm Bureau agrees these areas should receive protection. With the recent acquisition of the 7,300 acre Big River parcel and it's addition to the Mendocino Headlands State Park, combined with the numerous other park holdings in the immediate vicinity it is our view that the remainder of JDSF must stay in timber production.

Forest research on JDSF is world renowned. The state forest has been providing information on sustainable forestry for almost fifty years. JDSF is home for a permanent plot system that was initiated in 1958 that generates the majority of the data for growth simulations used by managers up and down the north coast. The Casper Creek watershed projects are studied in every forestry school in the United States. The research programs contribute to improved forest practices on JDSF and many private land holdings. Such things as improved erosion control, habitat management, harvesting techniques, and watershed restoration are demonstrated on the forest. In order for this type of research to continue the forest needs diversity in stand structure only obtained by continued harvesting. JDSF needs to remain a laboratory for research and demonstration of innovative techniques for private landowners.

6

7

The question that ultimately needs to be answered is the EIR adequate? The courts have not looked for perfection in this document. They look for adequacy, completeness and a good faith effort at full disclosure. This document gives a decision maker the necessary information on all reasonable environmental consequences to adequately and intelligently make a decision. Furthermore, this is a Programmatic EIR and is tiered to a Timber Harvest Plan which is the functional equivalent of the CEQA process. Specific issues such as streamside protection, buffer zones, silvicultural prescriptions and project level concerns are addressed at this juncture. Through this process the public has still another opportunity to address any outstanding concerns.

8

The Mendocino County Farm Bureau strongly feels alternative B is the alternative that give managers the flexibility needed to properly manage JDSF. We

FINAL EIR FOR JDSF MANAGEMENT PLAN

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.

Please distribute copies of this letter to the current members of the board.

Sincerely,



G. Tyler Nelson, President
Mendocino County Farm Bureau

C/C

Mendocino County Board of Supervisors
California Farm Bureau Federation

Mr. Doug Mosebar, President

Mr. George Gomes, Administrator

Ms. Noelle Cremers, Director of Natural Resources

County Farm Bureaus

California Forestry Association

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-7

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 DEIR and approve a management plan.

Response to Comment 3

Comment noted. Alternative G and the ADFMP place limitations on the amount of clearcutting and other evenaged management permitted, while still allowing these silvicultural methods to be used to support research and other specified forest management needs, such as forest health.

Response to Comment 4

The Board agrees with this statement. Finding effective ways to deal with issues such as invasive exotic plants would be beneficial.

Response to Comment 5

Comment noted.

Response to Comment 6

The proposed management plan provides for diversity in stand structure, which is necessary for maintenance of a viable research and demonstration forest.

Response to Comment 7

Comment noted.

Response to Comment 8

Support for Alternative B noted.

P-8

Jan. 25, 2006
Orisk, Ca

George,

Would appreciate it if each
board member could get a copy of
this correspondence and attachment.

Thanks

Bill Smith

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JAN 30 2006

BOARD OF FORESTRY
AND FIRE PROTECTION

FINAL EIR FOR JDSF MANAGEMENT PLAN

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

January 21, 2006
Ukiah, Calif.

Dear Board Members:

I have been a forester since first working for the U.S. Forest Service as a summer fire fighter at sixteen years of age in 1946. Also I have a B.S. degree in forest management and have, with my family, owned a tree farm in Mendocino county since 1983.

1 I believe that the E.I.R. and proposed alternative C-1 for the management of Jackson Demonstration State Forest is the best alternative available. With the ever growing, mostly urban, population here in California, compromise is the name of the game. Though this management plan alternative does not maximize economic returns to the state nor the county it should satisfy the normal economic concerns of the average citizen.

As a representative of a past purchaser of J.D.S.F timber sales, I have been a spectator to the efforts of the J.D.S.F. staff to find ways to better harvest the forest resources with results that were more environmentally acceptable and way ahead of the current practices.

2 They have led the way to better forestry here on the north coast. Hopefully they will be able to continue to be able to do so under the new proposed management plan. Though they will have successes and some failures this is the place to have them so that your board can fabricate more effective rules for the private sector forest owner.

Mendocino County has gone from hundreds of mills at one time to four at the present time. Originally they were pretty much family owned affairs which later became corporate operations. Now the remaining mills are again family operations. As an example of the concern for the forest even by the early family owners I am enclosing a couple pages from a copy of an index of some old Union Lumber Company files. I salvaged the files from company records several years ago, indexed them, and gave them to the Willits Museum's archival collection. They show that even way back in the 1920,s the family mill and forest owners recognized the need for forest management to perpetuate a viable forest. This has not changed. Much of the current stands of fir and redwood on Jackson Forest are the results of early Caspar Lumber Co. plantings.

3 The current mill operations in this area need a stable resource source such as J.D.S.F. has provided in the past. The county government needs the yield tax revenue and the local economy needs the jobs that the harvesting of this forest resource will provide while still providing recreational opportunities and environmental protection. This can be done at a reasonable level with plan C.1.

4 As a forest land owner I need to be able to better contend with the forest practice and other state regulations in order to make my tree farm a viable economic entity and provide wood for those that depend on our forests. Though I have selectively harvested this property in 1957 and 1983 and it now needs thinning. I cannot economically do this. My neighbor to the north has come to the same conclusion and sold to an urban family who is building a weekend retreat and will be an unlikely source of wood fiber in the future. My neighbor to the south is growing bumper crops of marijuana. This seems to be the direction that forest land use is taking here on the north coast. It is my hope and the hope of many of my fellow forest land owners that the demonstrations on future harvests on

FINAL EIR FOR JDSF MANAGEMENT PLAN

5 J.D.S.F. will show us how to keep our forest lands economically productive.

Though the state of California owns Jackson Demonstration State Forest, the citizens are the real owners and expect a balanced use as was the intent when J.D.S.F was purchased from Caspar Lumber Company. A substantial portion of the public lives on a limited budget with little or no discretionary income, particularly here locally. To deprive them of the economic benefits available from the resources of J.D.S.F. is unfair.

Please get this forest producing again; both in knowledge and fiber. I know this may seem to you like a lengthy correspondence but the decision you make will be a preeminent one for the direction of forestry on the north coast of our state and is of great importance to myself and my family.

Sincerely



William F. Smith
Registered Professional Forester # 537 retired
275 Mendocino Place
Ukiah, California 95482
Ph. 707 462 3385

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-8

Response to Comment 1

Support for Alternative C1 noted. Alternative G was developed by blending the elements and management strategies of several Alternatives, including Alternative C1. The management plan reflects the intent of the legislative mandate for the State Forest. The State Forest will continue to be a working demonstration of viable and effective forest management, while also promoting long term stewardship.

Response to Comment 2

The management plan will enable JDSF to continue to demonstrate new and improved management techniques. The demonstration program on the Forest serves as a valuable tool for informing the Board as regulations are considered.

Response to Comment 3

The Board concurs that JDSF provides a valuable source of timber and revenue for the local economy. The management plan includes provision for sustained production and long term sustained yield (LTSY). Support for Alternative C1 is noted. Please see General Response 2.

Response to Comment 4

The Board is also hopeful that JDSF can play a role in demonstrating that timber production is a viable and valuable use of forest land in the region.

Response to Comment 5

The management plan will provide for a significant economic contribution to the local economy.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-9

January 27, 2006.

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

RECEIVED BY

JAN 30 2006

BOARD OF FORESTRY
AND FIRE PROTECTION

Dear Board Members:

I am a retired eighty-seven year old Forester (RPF #89) who received a degree in 1941 from the College of Agriculture at Berkeley, California, with an education in Forestry.

My personal biases on forest use are born in the days when we could climb a stump and shout to the world around us that I am going to cut some trees. Things change.

I came to Mendocino County shortly after the sale of the Casper timberlands to the State and, since then, participated in review of many of the timber sales from the demonstration forest for my Consulting clients. I remember particularly Whiskey Gulch which had a pure stand of young growth Redwood resulting from the early day oxen and donkey engine clear cutting. I shared time in 1972 in the only loss of the Forest when an acreage was traded to the Union Lumber Company for the value of the Mendocino Headlands. In more recent years I worked on the appraisal for Park Acquisition of the Young Growth along the Navarro Strip which had been a clear cut in the first twenty years of the 1900s. The good results of reproduction from a Clear Cut, as demonstrated by the luxurious growth of the Navarro Strip, if one thinks as a normal human does, is but a blip in the lifetime of a tree. Coastal White Fir is difficult to control without careful forestry considerations. Forests and Foresters need freedom to make decisions for the future of our forests.

Times change human attitudes and I must reluctantly recognize this change. We are in an era of today and limited future. We must guide ourselves in thinking for the good of the future.

It seems to me that the best compromise of the present regrettable hiatus of the experimental use, with such an extended loss to the Redwood Region of the use that the Casper people intended in their practically give away of the Jackson State Demonstration Forest, is the Alternative Plan 'C1'. This might never satisfy the do-gooders and those that say 'logging' is a dirty word but that attitude is bad, bad, bad.

Please support Alternative 'C1'.

Respectfully,


Robert T. MacDougall, Jr
105 Barbara Street
Ukiah, CA 95482

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-9

Response to Comment

Support for Alternative C1 noted. Alternative G was developed by blending the elements and management strategies of several Alternatives, including Alternative C1. The management plan reflects the intent of the legislative mandate for the State Forest. The State Forest will continue to be a working demonstration of viable and effective forest management, while also promoting long term stewardship.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-12

1/31/2006

Westport, CA

Dear Board of Forestry,

1

Regarding Jackson State Forest. I request you select Alternative D which permits Sustained Yield Forestry to be the primary use of the Forest. I would also like the proceeds from State Forest Sales to be utilized on the Forest to promote the following objectives;

- Stand Improvement Measures including Pre-Commercial Thinning, Hardwood Controls, etc.
- Reduction of Fire Hazards.
- Reduction of Garbage Dumped in the Forest.
- Increase in Security.
- Improvements to Infrastructure notably Stream Crossings.
- Implementing Recreational Uses, primarily hiking and biking.

2

I believe it is imperative Jackson be a working Forest which helps sustain our local economy. I also encourage you to select Alternative D which does not include Clear Cutting. I feel most of the landowners (the people of California) do not want to employ this Silvicultural Method. It is my hope the Board will consider the laymen viewpoint, even though it may not be based on the Science of Forestry.

3

One of my Clients owns about 200 acres adjacent to the State Forest in Caspar Creek. I know he does not enjoy the condition of the roads and the dumping of garbage and other common uses of the Public of the State Forest. In his case he has spent thousands of dollars cleaning up his property from illegal dumping from people using the Forest Roads. The lack of Security is degrading environmental values including water quality and upslope aesthetics. I manage his Timberlands for Sustained Yield Forestry and I believe he would welcome more active management of the State Forest. Of course improvements and maintenance must be funded via the income from Timber Sales. I strongly feel that if the Public saw Selection Methods which employed some minimal aesthetic considerations, and saw the ensuing funds improving the forest, there would be overwhelming support for Active Management of the State Forest.

As a Professional Forester and Timberland Owner I am tired of the legal wrangling which has not permitted the State Forest to be managed for the most basic purposes, including removal of garbage. Please select an Alternative which will get our Forest working to provide not only wood products but the recreational and infrastructure improvements that most members of the Public would be pleased about. I lived in Arcata for many years and the use of the Community Forest, including Harvesting, is accepted by people of many viewpoints. Jackson could be a similar situation. Please slightly compromise with the Critics of Jackson and Forestry in general and choose Alternative D that includes Sustained Yield Harvesting.

Sincerely,

Tom Kisliuk
RPF #2676

Agent for Timberland Owner Ed Powers on JSDF Road 500.

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-12

Response to Comment 1

Support for Alternative D noted. The management plan provides for utilization of revenue in support of the items noted.

Response to Comment 2

The management plan will provide for a significant contribution to the local economy. The stated preference for no clearcutting is noted. The management plan restricts the application of even-aged management and restricts the use of clearcutting to that needed to support a diverse research program and areas with extreme regeneration difficulties where clearcutting offers a viable means to regenerate these sites. Very little clearcutting is anticipated (see also General Response 10).

Response to Comment 3

The Board believes that active management includes strong forest security, which will improve the level of environmental protection, and will reduce the impacts upon aesthetics caused by illegal dumping.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-13

ALBERT PETER BELTRAMI
145 Mendocino Place, Ukiah, CA 95482

Tel: 707-462-6230

email: abel@saber.net

Fax: 707-462-7890

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

31 January 2006

Re: Jackson Demonstration State Forest

Gentlemen/Ladies:

I am writing to urge you to support alternative C-1 as outlined in the Jackson Demonstration State Forest environmental impact review document.

After reviewing the document and its various alternatives carefully, I believe that Alternative C-1 is the best approach for a balanced and considered management of JDSF into the future.

This approach melds the best of past practice with updated and emphasized public protections and utilization. The proposal C-1, as recommended by your Staff, combines environmental concern with a balanced respect for appropriate timber harvest and education.

The provision of public access, public education, preservation of sensitive areas, appropriate harvesting, income for state and local governments, and economic benefits for local workers and industry are all ingredients for a successful and balanced approach to the JDSF.

JDSF has historically provided an avant garde approach to timber management and intelligent utilization of a growing resource. Proposal C-1 refines that historical utilization, with the added ingredients of increased public education, access and preservation of delicate areas.

Combine the success of the past 40 years with new features that serve the public and the environment and adopt proposal C-1.

Sincerely,



Al Beltrami

Mailed Letter P-13

Response to Comment

Comments and support for Alternative C1 noted. The management plan, as adopted, represents a reasonable balance between production, protection, restoration, and recreation. The Board agrees that the management of the past has been largely successful in implementing the intent of the Board and enabling legislation as specified in the various management plans of the past.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-14

January 30, 2006

Robert G. Ingram
239 Harper Street
Grass Valley, CA 95945

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

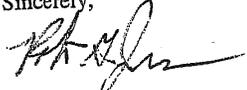
Dear Sir:

I am writing in support of the Jackson Demonstration State Forest's (JDSF) draft Environmental Impact Report. The preferred alternative – **Alternative C-1** best mimics the goals and objectives of the State's experimental forest.

For over 50 years the forestry research conducted at JDSF produced valuable best management practices information. Additionally revenues derived from the perpetual sustained harvesting helped the local economy with well paying rural jobs. With 80% of California's wood needs supplied by imported lumber, the public needs to observe and understand how all the state's resources can be protected while retrieving a continual supply of wood products.

Alternative C-1, clearly is the best choice.

Sincerely,



Robert G. Ingram

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FEB - 1 2006

BOARD OF FORESTRY
AND FIRE PROTECTION

Mailed Letter P-14

Response to Comment

Comments and support for Alternative C1 noted. The Board agrees that there is value in demonstration of effective resource protection while producing timber products at the State and local level. Continued or increased production from California forests may help to reduce the level of imports, and may serve to reduce environmental impacts in areas not subject to significant environmental protection.

P-15



MENDOCINO COAST AUDUBON SOCIETY

POST OFFICE BOX 2297
FORT BRAGG, CA 95437
707-964-6835

February 2, 2006

Warren Wade
President

David Jensen
Vice-President

Tanya Smart
Secretary

Judy Steele
Treasurer

Board Members
Andarin Arvola
Becky Bowen
Jeanne Coleman
Tony Eppstein
Charlene McAllister
Art Morley
Virginia Wade

Christopher P. Rowney, Program Manager
Demonstration State Program
California Department of Forestry & Fire Protection
P.O. Box 94426
Sacramento, CA 94244-2460

Re: Draft EIR for the Jackson Demonstration State Forest
Management Plan, SCH# 2004022025

Dear Mr. Rowney,

This letter represents a response from the Mendocino Coast
Audubon Society (MCAS) to the Draft EIR for the Jackson
Demonstration State Forest Management Plan:

MCAS understands the importance of the timber industry to
the local economy and respects the legal authority of the
state to harvest timber in Jackson Demonstration State
Forest with the understanding that the purpose of the
timber harvest on state property includes research,
management, protection and respect for the biodiversity of
this area.

2

The society is concerned about protection of the following
listed bird species in Jackson Demonstration State Forest:

- Osprey
- Sharp-shinned Hawk
- Cooper's Hawk
- Northern Goshawk
- Marbled Murrelet
- Long-eared Owl
- Spotted Owl
- Vaux's Swift
- Purple Martin
- Yellow Warbler
- Yellow-breasted Chat

FINAL EIR FOR JDSF MANAGEMENT PLAN

Christopher P. Rowney, Program Manager

February 2, 2006

2 Our Society feels management proposals in the DEIR do not adequately address protection of these birds (as well as other species).

3 Specifically, we do not believe clearcutting is an acceptable alternative in any timber harvest. Experience tells us this legacy of the 19th century is devastating to all wildlife as well as to vegetation, soil and watershed. After more than 150 years of practice, we see no need for clearcutting. However, as Jackson is a demonstration forest and research techniques require clearcutting as long as this practice is on-going in other areas of the state, we believe that clearcutting and tractor yarding in this forest should be practiced as little as possible with a management goal of elimination at the earliest possible date.

4 The Draft EIR Management Plan for the forest does not address habitat needs of birds that require trees for food and shelter. Research cited in the draft is confusing and hard to follow. References cited in the text are not always noted in the appendix. For instance the reference to a Lehmkuhl and Raphael, 1993, study cited on p. VII 6.6-28 about the configuration of mature and late seral forests surrounding owl nests is not cited in the appendix.

5 We see no basis or adequate explanation for the models referred to as "Tables of Per Cent Change in Habitat Capability." We question the source and accuracy of these models and believe the management of the forest should come from relevant data gathered about the specific area by scientists who can apply their observations about Jackson Demonstration State Forest to management of this particular forest.

6 It is our opinion that bird surveys are often out-of-date within a few years, do not necessarily meet professional protocol, and may not include many species that are vital to the ecology but are not on the endangered or threatened species list.

7 With that in mind, we are requesting regular professional bird point counts be part of the management plan for the forest.

8 We also request that protection of the redwood canopy ecosystem be part of the management plan. We think it is important for you to consider research currently underway at Humboldt State University-Arcata, CA, where scientists have described the ecology of older-growth redwood forest canopy that includes soil, fungi, ferns, mature Douglas fir and hemlock trees, amphibians, reptiles, crustaceans and mammals—located in the crowns of redwoods hundreds of feet above ground level (*New Scientist* London: Nov 9, 2002. Volume 176, Issue 2368, p. 46-49).

9 It is not our intent to ban tree harvesting in the forest or to tell professionals how to do their jobs. We ask only that good science be applied to the practice of sustainable harvesting and that the resources of this vital part of our community be used in a way that provides protection for wildlife and plants.

FINAL EIR FOR JDSF MANAGEMENT PLAN

Christopher P. Rowney, Program Manager

February 2, 2006

10 We generally agree with the alternatives E and F put forth in the DEIR, and find alternatives C1 and C2 unacceptable. Elements of alternatives E and F which we think should be part of the demonstration forest management include protection of the forest ecosystem, minimal even-age harvest for purposes of research only with a goal of elimination of clearcutting and tractor yarding, no harvest of old growth, a low-to-moderate level of harvest, development of recreational facilities only when there is no risk to wildlife (including fish) and removal of invasive species by the most environmentally responsible method supervised by an ecologist with botanical credentials.

11 A Marbled Murrelet recovery demonstration area of at least 4,000 acres at the headwaters of Jughandle Creek and Russian Gulch (or any other part of the forest that is designated by biologists as a probable Marbled Murrelet nesting site) would be a beneficial aspect of the forest management—as would continued study and monitoring of Northern Spotted Owls.

12 As a practical matter, we also request that future draft proposals as well as the final management plan and any further publications that invite public participation be distributed in paper form to the library at the Mendocino Campus of College of the Redwoods, Fort Bragg, CA, where these issues are studied as part of the natural history and environmental science programs. The college is the institution of higher learning nearest to Jackson Demonstration State Forest.

We appreciate the opportunity to write to you about this and look forward to a timely response.

Sincerely yours,

Board of Directors, Mendocino Coast Audubon Society



Warren F. Wade, President

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-15

Response to Comment 1

The ADFFMP reflects the Board's policies. Active timber harvest is conducted for the purposes of research and demonstration, while providing protection and maintaining or enhancing biodiversity.

Response to Comment 2

The potential for impacts to listed bird species and species of special concern was considered within an extensive assessment area that includes not only JDSF, but also the entire Noyo and Big River watershed areas. The assessment considered currently available habitat, and anticipated habitat availability in the future. Both direct and indirect impacts to individual species were considered. Based upon the assessment that was conducted, significant impacts to these species are not expected to occur, due to the long-term retention and creation of suitable habitat.

Response to Comment 3

Please see General Response 10. The practice of clearcutting is to be minimized within JDSF. Significant impacts associated with this minimal level of clearcutting are not expected to occur. In fact, when utilized as proposed, the creation of even-aged forest patches may prove beneficial to some species of wildlife, in conjunction with retention of structural elements as proposed. Species such as the osprey and purple martin have been associated with structural elements that often occur naturally within or above forest clearings. In the past, these features were often associated with the natural occurrence of fire.

Response to Comment 4

The analysis performed for the DEIR specifically recognizes and considers the value of forested habitat for birds, including the values of food and shelter (see DEIR Sections VII 6.6 and VIII 7.2). The citation of Lehmkuhl and Raphael (1993) has been added to the list of references.

Response to Comment 5

The cited tables and methods are explained in detail in DEIR Section VII.6.6. An appropriate and thorough assessment of the potential for impacts to wildlife makes use of both models and scientific data and observation. The models utilized in the assessment are widely recognized, and their use is supported by the Department of Fish and Game. Specific local data and observation is limited. Due to these limitations, models are capable of providing valuable insight into potential for impacts.

Response to Comment 6

The comment is not specific regarding perceived survey limitations. The analysis included the best available information. The management plan will maintain habitat for all species that currently utilize the Forest, and will provide for creation of additional habitat for bird species that are associated with older forests.

Response to Comment 7

The management plan provides for protocol survey of bird species of concern, and an assessment of potential impacts associated with planned projects. Protection of species will also be provided by provisions for maintenance and creation of habitats. The finalized plan's future research priorities include examining upland wildlife habitat relationships.

Response to Comment 8

The Board agrees with this statement. Development of late seral forest and associated canopy will be an important element of the management plan. The ADFFMP designates an Older Forest Structure Zone that will connect most existing old growth groves resulting in a 6,803 acre linkage across the forest. This can provide an area available for research on forest canopy.

FINAL EIR FOR JDSF MANAGEMENT PLAN

Response to Comment 9

The ADFFMP makes use of good science in the practice of sustainable harvesting. 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 timber 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. CAL FIRE has consistently harvested well below the growth of the forest, resulting in an ever increasing inventory of larger, older trees. Protection is provided to wildlife and plants, and significant impacts are not expected to occur.

Response to Comment 10

Support for Alternatives E and F noted. Comments concerning management preferences noted. The management plan provides for retention of old trees with structural characteristics of value to wildlife. The development of recreational facilities will be preceded by an assessment of the potential for impacts to fish and wildlife. Significant impacts will be avoided through use of thorough assessment, including appropriate siting, and mitigation. Invasive species control will be accomplished by utilization of methods that will avoid significant impacts (see DEIR Section VII.8), and will be administered by personnel with the appropriate credentials and training to meet existing regulatory standards. The Forest staff includes individuals with training, experience, and education in the field of forest ecology.

Response to Comment 11

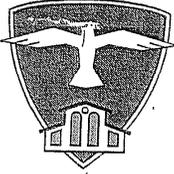
The Board recognizes the contribution that JDSF can make to the recovery of the marbled murrelet. The proposed management of forested area for development of late-seral forest conditions will aid in the development of potential habitat for the species. The management measure found in DEIR Section VII.6.6.4 will insure that a future contribution toward additional potential habitat will be carefully considered. Alternative G designates an additional 1,549 acres in the area of upper Russian Gulch and lower Big River to late seral development prescriptions specifically intended to recruit habitat for the marbled murrelet (see RDEIR Map Figure 1). See also General Response 9.

Continued study and monitoring of northern spotted owls is expected to occur.

Response to Comment 12

Request noted. The management plan and final EIR will be made available to the public.

P-16



Freeman Realty RECEIVED BY

1468 South Main Street • Willits, California 95490
(707) 459-6750 • Fax (707) 459-6620

FEB 3 2006

BOARD OF FORESTRY
AND FIRE PROTECTION

Jan. 30, 2006

Dear Sirs:

I would like to register my opinion
about the DEIR for Jackson State Forest.

The Citizens Advisory Committee proposal
Alternative D, with further restriction
on herbicides, seems most appropriate
for Mendocino County.

Yours truly,

Patty Freeman

Mailed Letter P-16

Response to Comment

Comments noted. Preference for Alternative D, with further restrictions upon the use of herbicides noted. The Board has initiated an approach that will limit herbicide use relative to C1. Alternatives to the use of herbicides will be explored and tested (see also General Response 7).

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-17

Allen Overfield
147 N. Sanderson Way
Fort Bragg, CA 95437

January 30, 2006

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

RECEIVED BY

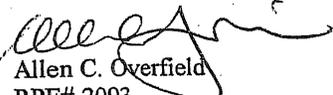
FEB 3 2006

BOARD OF FORESTRY
AND FIRE PROTECTION

Dear Mr. Gentry,

- 1 Please forward my comments to the Board for consideration in regards to the Draft Environmental Impact Report for Jackson Demonstration State Forest. I am an RPF, a former local school board member and an avid recreational user of JDSF. It is my preference that either Alternative C1 or C2 should be adopted by the Board for the following reasons.
- 2 Either proposal will allow for an Annual Allowable Harvest of 31 MMBF/year. Both uneven-aged and even-aged management should be allowed in order to provide the flexibility needed to manage the individual timber stands in the most appropriate manner. Herbicide use should be allowed when it is applied in a professional and judicious manner.
- 3 I believe that the timber harvest program is an integral part of the management of JDSF. Our local economy and schools depend of this program for jobs and local revenue. Timber harvest is compatible with all the other uses of the forest and it is integral to the concept of sustainable living.

Sincerely,


Allen C. Overfield
RPF# 2093

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-17

Response to Comment 1

Preference for Alternative C1 or C2 noted.

Response to Comment 2

The Board agrees that the form of stand management utilized should be appropriate for the stand and management objective. Both even-aged and uneven-aged management will remain available, though some site-specific limitations will apply (see also General Response 10). The management plan, as approved, uses a set of structural goals to guide planned harvest actions. The central goal is not a particular level of timber harvest or a preferred method of harvesting but a set of forest structures that represent the full breadth of forest conditions. A significant level of timber production is anticipated.

Herbicides may be utilized as part of an integrated pest management (IPM) system, and will only be applied in a professional and judicious manner (see also General Response 7).

Response to Comment 3

The Board agrees with these statements. State Forest management will make a significant contribution to the local economy, and will serve to demonstrate the compatibility between timber production and other forest uses and values.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-18

SHORELINE RIDERS, INC.

P.O. BOX 695
FORT BRAGG, CA 95437

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FEB 3 2006

BOARD OF FORESTRY
AND FIRE PROTECTION

January 30, 2006

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

Mr. Gentry:

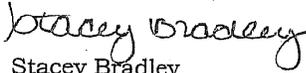
Our club represents over 200 members ranging in age from 6 months to over 80 years. Over the years many of us have enjoyed Jackson State Forest for recreational purposes, for others it has supported our households by way of jobs or revenue to our local businesses.

Since Jackson State Forest was shut down a few years ago the effect has been devastating to our club members, their families, our community and our county.

Our group **urges** you to accept the proposed EIR and return Jackson State Forest to an active forest. Jackson State Forests continued operation is imperative for many of us to survive.

Thank you for your consideration.

Sincerely,



Stacey Bradley
Board Member

SB

Mailed Letter P-18

See Response to Form Letter 1.

Response to Comment

Comments noted. It is the intent of the Board through adoption of the management plan that JDSF continue to make a significant contribution to the local economy, while remaining a valuable recreational resource. The Board agrees that the recent absence of revenue has had a negative effect upon the local economy. It is the Board's intent to return JDSF to a status of full and active management as soon as possible.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-19

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FEB 3 2006

BOARD OF FORESTRY
AND FIRE PROTECTION



MENDOCINO COAST CYCLISTS

PO Box 742, Fort Bragg, CA 95437

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

January 29, 2006

Dear Mr. Gentry,

Thank you for asking for input on the Draft Environmental Impact Report (EIR) for Jackson Demonstration State Forest (JDSF).

Mendocino Coast Cyclists (MCC) is a cycling club interested in riding opportunities on the Mendocino Coast. In the last three years MCC has held three trash clean-up days and four trail workdays totaling over 400 hours of volunteer work on JDSF.

MCC is concerned about the statement in the EIR for JDSF under 14.2.1 Carrying Capacity stating, "outdoor recreation opportunities abound on other public lands in Mendocino County and the North Coast region". There are no other public lands in this area that allow cyclists to ride on single-track trails. Roads that are closed to motor vehicles and allow cycling are limited to a few miles other than on JDSF. There is no other place that camping is free in this area. Cyclists very much value all these recreational opportunities not open to them except on JDSF. MCC would like to see a large increase in single-track trail miles open to cycling on JDSF. Also of concern is the omission in 14.2 Existing Recreation on JDSF under Campgrounds of Volcano Camp on Road 1000. This camp offers a great stop for cyclists wishing to do a multi day ride thru JDSF.

MCC understands timber harvesting is important to JDSF and the community. Recreation opportunities can coexist with timber harvesting by temporarily closing active harvest areas as in the past. Efforts to reestablish trails in harvested areas are appreciated very much. MCC hopes to work with staff and management at JDSF for increased cycling opportunities creating other places to ride when an area is temporarily closed. Thank you again for asking for our input.

Sincerely,

Marc Tenzel, President / Chris Clutton, Secretary / David Desautels, Treasurer

Three handwritten signatures are present, corresponding to the names listed above: Marc Tenzel, Chris Clutton, and David Desautels.

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-19

Response to Comment

The management plan proposes a modest increase in the recreational trail system within JDSF, following a site-specific environmental analysis (see also General Response 14). However, most of the road system within JDSF will remain open to riding and hiking, subject to seasonal closure, or temporary closure due to management activity for safety purposes. At this time, no change in camping policy is anticipated.

The Volcano Camp has been closed for many years, due to access and maintenance problems. The status of the camp will be evaluated and repairs considered. The request for maintenance and availability of the camp is noted.

CAL FIRE and the Board welcome continued participation by recreational groups, and welcomes consideration of alternative trail routes when existing routes are temporarily closed due to management activity. The Department will form and consult with a local recreational user-group.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-22

RECEIVED BY

FEB 3 2006

BOARD OF FORESTRY
AND FIRE PROTECTION

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

January 31, 2006

Re: Comments on JDSF DEIR

Dear Mr. Gentry and other Board Members:

1 My name is Michael Thrush. I graduated (B.S. Forestry) from UC Berkeley in March of 1979 with a Forest Management emphasis. I have been employed in forestry work since 1974. I obtained my RPF license in July of 1986 (#2303). I am writing to express my support of **Alternative C1 (Proposed Project - Management Consistent with the May 2002 Draft Management Plan)** as regards management of Jackson Demonstration State Forest (JDSF). This alternative best balances the stated goal(s) of JDSF while protecting the environment and other resource values.

2 JDSF is the only publicly owned forest in the redwood region where large-scale research and demonstration can take place. This is a vital evolving task which should be given maximum flexibility. I believe Alternative C1 affords the most flexibility and the widest range of research and demonstration opportunities.

3 Current Forest Management Policy (Chapter 0351.2 A) states that "Timber production will be the primary land use on Jackson, Latour, and Boggs Mountain State Forests." I believe Alternative C1 best meets this stated primary goal of JDSF.

4 While I would personally like the harvest during the first decade to be closer to estimated growth, I am also aware of the other resource values which must be satisfied. Alternative C1's 31 MMBF per year harvest during the first decade represents only 70% of growth and 1.4% of inventory. I have some concerns that by not harvesting growth, overstocking or fire concerns may become a problem. This alternative is certainly better than many of the others which harvest much less.

FINAL EIR FOR JDSF MANAGEMENT PLAN

5 Another reason I like Alternative C1 is that it allows even-aged management and allows the use of herbicides. These are proven and safe management tools which certainly offer unique and needed research opportunities. I also like the less entries required (in clearcutting) and the foraging opportunities afforded to neo-tropical birds, etc. before the trees grow and close the stand. Going to strictly uneven-aged systems or no management at all would effectively negate these important early seral stages. With fire exclusion in effect for a century, clearcutting under an even-aged system is the only silviculture which closely mimics this natural disturbance.

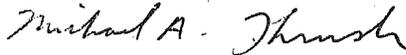
6 I am also concerned with all the lumber being imported into our state. It is short-sided and irresponsible to be adding all the unrenewable (shipping) fuel hydrocarbons into our atmosphere when we have such a productive, renewable resource right here. As our state's population increases, this will be more and more important.

7 I also fear that the no or restricted timber management options will lead to further local job losses and mill closures. Once the infra-structure for timber products (loggers, mills, suppliers, etc.) is lost, it will be hard to re-establish. The likely result would be more catastrophic wildfire losses (and loss of homes, lives; unacceptable air pollution, soil and habitat destruction, etc.).

8 I believe the State and National Parks and Wilderness areas offer plenty of opportunities for recreation and old growth. Alternative C1 protects old growth stands and allows recruitment of old growth in riparian stream zones. It also will allow recreational corridors which emphasize demonstration values. This will be a great opportunity to educate the general public on various forest management treatments and appears to be at an appropriate level.

In conclusion, I believe that Alternative C1 represents the best alternative for management of JDSF. This alternative allows a reasonable annual harvest based on sustained yield principles and is compatible with recreation, soil, water, wildlife, fishery values, and aesthetic enjoyment. Thank you for considering my comments.

Sincerely,



Michael A. Thrush
RPF #2303

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-22

Response to Comment 1

Support for Alternative C1 noted. The Board developed Administrative Draft Forest Management Plan (ADFFMP) strives to balance the concerns of all Californians while remaining consistent with the legislative mandate and Board policy for the Demonstration State Forest system (see General Response 2). The timber harvest level and allocation of silvicultural prescriptions under the Alternative G and the ADFFMP are based on providing a varied landscape with a diverse set of forest structures designed to support a world-class forest research and demonstration program, rather than to achieve a particular level of timber production.

Response to Comment 2

Comment noted. The Board agrees that the size of JDSF provides a unique opportunity for research and demonstration at the sub-watershed or habitat-level. The management plan retains management and research flexibility, while also providing for protection, restoration, and recreational opportunities.

Response to Comment 3

Comment noted. The legislation that provided for establishment of the State Forest makes it very clear that demonstration of maximum sustained timber production is one of the primary purposes of forest management at JDSF; therefore a significant level of sustained timber production will occur at JDSF. The Board supports a balanced multiple use concept and maximum sustained production of high quality timber products.

Response to Comment 4

The level of fire hazard presented at JDSF is affected by many factors, including timber harvesting. However, the relative level of fire hazard is not directly related to the level of annual harvest, being much more influenced by stand structure, fuel levels, access, ignition potential, and fire control opportunities. While harvesting tends to reduce the volume of timber in a given area, the reduction in standing volume alone does not necessarily reduce the level of fire hazard. Please see Section VII.8.3 of the DEIR for the assessment of impacts associated with fire. Significant impacts are not expected to occur.

Response to Comment 5

Comments noted. Management of JDSF will include provision for continued use of even-aged management systems and herbicides, subject to limitations (see also General Response 7 and 10). Future stand management will create and maintain habitat for neo-tropical bird species through periodic creation of early seral stages of stand development. The potential environmental effects of stand management have been considered, and significant impacts are not expected to occur. Impacts will be avoided by many factors, including harvest limitations, establishment of protection zones, harvest level and rate, and erosion control measures. Please see DEIR Section VII for the assessment of potential impacts associated with general management of the Forest.

Response to Comment 6

Comment noted. The relative production of hydrocarbons associated with importation of forest products is speculative, and was not assessed in the DEIR.

Response to Comment 7

Comment noted. The management plan will provide for a significant level of sustained timber production, estimated to fall within the range of 20 to 25 million board feet per year for the first decade. The relationship between future production levels at JDSF and the remainder of the local area is somewhat speculative, as is the relationship between timber producing expertise and wildfire potential. However, the analysis considered the level of harvest proposed for JDSF in combination with an estimated level of harvest on private lands within the assessment area.

FINAL EIR FOR JDSF MANAGEMENT PLAN

Response to Comment 8

Comments noted. JDSF is a valuable recreational resource, and this value is confirmed in Board policy. The Board agrees that forest management will provide a valuable public education benefit. Please see General Response 14.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-23

February 5, 2006

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

Reference: Jackson State Forest

I am unable to participate in a verbal session since I am very deaf and can not hear but maybe half of the close conversations that people with normal hearing easily hear.

I would like to say a good word for Clear Cutting.

I am a 1941 Graduate in Forestry from U.C. Berkeley, have resided in Mendocino County since 1951, and have worked mainly in the Redwood Region from near the San Luis Obispo County line in Monterey County north to the Oregon Border. A fair share of my experience is on the Jackson State Forest's timber sales programs.

- 1 I am against the vast area clear cutting of over a hundred acres as has sometimes been practiced in recent years by the Industry.
- 2 However, Redwood reproduction often depends upon single species management. In the whole region and particularly on the State Demonstration Forest I believe a system allowing clear cutting up to 20 or 25 acres in a block would be beneficial and allow for good Forest Practice and good land and forest management.


Robert T. MacDougall, Jr.,
R.P.F. #89 retired
Consulting Forester
105 Barbara Street
Ukiah, CA 95482
<rtmkvm@pacific.net>

Mailed Letter P-23

Response to Comment 1

The Forest Practice Rules restrict clearcut size to 40 acres or less, depending upon local conditions. Even-aged forms of management, including clearcutting, are appropriate under certain conditions and when appropriately applied. Though clearcutting will be limited, forms of even-aged stand management and forms of uneven-aged management that make use of small patches or groups of trees of the same or similar age will continue to be demonstrated within JDSF(see also General Response 10).

Response to Comment 2

While redwood regenerates and grows well in full sunlight, such as the condition often created after a clearcut, the species is capable of regenerating in association with other local species, including Douglas-fir, grand fir, hemlock, ceanothus, and tanoak.

FINAL EIR FOR JDSF MANAGEMENT PLAN

— P-24

George A. Hollister
PO Box 148 ph. (707) 937-5918
Comptche, CA 95427
e-mail hranch@saber.net FAX (707) 937-3064

Feb. 1, 2006

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

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FEB - 6 2006

BOARD OF FORESTRY
AND FIRE PROTECTION

Re: JDSF Management Plan draft EIR

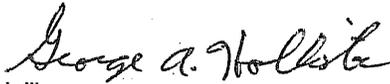
Dear Mr. Gentry

I have been a commercial forest owner and logger for the past thirty years. I know that human enterprise can make the forest a better place. And commercial forest management based on science can meet the needs of people better than forest management that excludes people and ignores science. Jackson Demonstration State Forest is an excellent demonstration of a commercial forest that uses science to achieve it's humanitarian goals. It is an example of management that is capable of meeting the diverse challenges of today as well as it met the challenges it faced when conceived fifty years ago.

The Draft EIR of the Draft Management Plan is beyond adequate. While it is not perfect, it is long on investigating issues with little humanitarian significance.

Alternative B is the preferred option for management. This is the most flexible choice and would meet the needs of the most people.

Sincerely,



George A. Hollister

Mailed Letter P-24

Response to Comment

Preference for Alternative B noted. Due in part to changes in regulation, environmental assessment, and forest management, a management plan that combines provisions of Alternative B with those of other alternatives has been developed and is reflected in the ADFPMP (Alternative G).

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-27

Jere Melo, Forester
120 Jewett Street
Fort Bragg, CA 95437
Phone: 707 964-0676
Cell Phone: 707 357-1671
FAX: 707 964-4407
E-Mail: jmelo@mcn.org

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FEB -6 2006

BOARD OF FORESTRY
AND FIRE PROTECTION

February 1, 2006

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

VIA E-Mail: board.public.comments@fire.ca.gov

RE: Jackson Demonstration State Forest (JDSF)
Draft EIR and Management Plan

Dear Mr. Gentry:

I wish to register my support for the following:

1. The Board needs to certify the EIR for JDSF as soon as comments to the draft have been answered; and,
2. The Board should select Alternative C 1 from the range of management alternatives.

2 Following are the important reasons for my decision:

1. The EIR is a substantial summary of information related to forest land management. The EIR provides Board members with sufficient information to make a decision about the management of JDSF.
2. Much of the information for the EIR was developed on JDSF. The EIR is not dependant on information developed from other locations. While the local information is important in a judgment on this EIR, the same information provides guidance for development of a proper regulatory scheme for the entire Redwood Region.
3. Alternative C 1 is the closest fit for property zoned as TPZ. JDSF is a **Demonstration Forest**, and the legislation related to state forest purposes, the goals of the Forest Practice Act and the zoning as TPZ in Mendocino County are best accomplished by the selection of Alternative C 1.
4. There are the local, social aspects that support the selection of Alternative C 1. Since management of JDSF was curtailed by court decision, jobs have been lost on the JDSF staff, and direct jobs in the logging and wood products manufacturing industries have diminished. Depending on the economic multipliers used, additional jobs have been lost in the support sectors of the local economy. Local governments and schools have

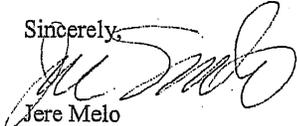
FINAL EIR FOR JDSF MANAGEMENT PLAN

seen substantial reductions from timber taxes. Alternative C 1 is the single alternative to mitigate those losses.

The Board will likely get a large number of comments to make active management a low priority. I urge the Board to consider the above factors in selecting a proper alternative for the management of JDSF.

Thank you for the opportunity to comment.

Sincerely,



Jere Melo
Forester

(Original with signature to be sent by mail)

Mailed Letter P-27

Response to Comment 1

Support for Alternative C1 noted. Since this comment was made, the Board has developed Alternative G and the ADFMP, which build on C1.

Response to Comment 2

Comments noted. The Board agrees that the DEIR appropriately assesses the potential for environmental effects to occur. The Board agrees that management conducted at JDSF can serve to demonstrate to, and inform policy makers, including this Board. Management at JDSF will provide a meaningful demonstration for owners of land zoned for timber production (TPZ), recognizing that owners are not likely to imitate the entire management program that is implemented at JDSF. The Board recognizes that timberland owners manage differently and have differing objectives.

Response to Comment 3

Most of the alternatives considered would provide a significant contribution to the local economy, including Alternatives B, C1, C2, D, F, and G, as well as the ADFMP, which is based on Alternative G. With the exception of Alternative A, all alternatives provide some level of sustainable timber yield. Given the complex interaction between economic forces within the County and within the local timber industry, the variation in economic effects produced by estimated timber production levels associated with some of the alternatives is not a certainty. No significant adverse economic effects are anticipated as the result of adoption of the management plan.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-29



Chamber of Commerce
MENDOCINO COAST

February 1, 2006

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

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FEB - 6

BOARD OF FORESTRY
AND FIRE PROTECTION

Mr. Gentry,

1

The Board of Directors of Mendocino Coast Chamber of Commerce is pleased to see progress being made on the Management plan and EIR for Jackson Demonstration State Forest (JDSF). The Chamber Board understands the difficulty of balancing the diverse points of view regarding forest management.

2

We feel strongly that education, restoration, recreation, and habitat conservation play a significant role in the management of JDSF. The Board further believes that all old growth stands and isolated old growth trees in JDSF shall be preserved and protected for future generations.

3

JDSF needs to be the leader in research and education on such issues as erosion control, stream restoration, habitat conservation and other issues affecting the overall health of the forest ecosystem. Research from the forest needs to be better disseminated to land owners and the general public so that all stake holders can share the educational opportunities.

4

The board further supports timber harvesting on JDSF in a sustainable manner with the utmost in environmental protection. We recognize the economic benefits to the general welfare and prosperity of our local business community provided by JDSF. Coastal Mendocino County needs a mix of forestry, fishery and tourism related jobs to keep our diverse economy sustainable.

Sincerely,

Debra De Graw
Executive Director

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-29

Response to Comment 1

Comments noted.

Response to Comment 2

The old-growth stands within JDSF will be preserved, as will individual old trees of significant size, and those with unique structural characteristics of value to wildlife. Please see General Response 8.

Response to Comment 3

Research and education are important components of the management plan. The Board agrees that research and demonstration results should be widely distributed. CAL FIRE is currently developing a website to catalogue the research and demonstration projects and/or publications that have been developed on the State forests (<http://demoforests.net/>). The website is incomplete, but the intention is to provide a comprehensive catalogue and a means to disseminate information, including data sets, regarding projects on the State forests. This website will be moved to the main CAL FIRE website (<http://www.fire.ca.gov/>) in the near future.

Response to Comment 4

The ADFFMP proposes to implement a program that includes a sustainable level of timber production to benefit the local economy, while providing a high level of environmental protection.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-31

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FEB - 7 2006

BOARD OF FORESTRY
AND FIRE PROTECTION

Michael Bates

P.O. Box 1018, Burney, California 96013

February 02, 2006 11:53 AM

Members Board of Forestry
PO Box 94246
Sacramento, CA 94244-2460

Subject: Jackson State Forest

Dear Members Board of Forestry:

- 1 I strongly support the proposed management plan for Jackson State Forest. I support the plan's clear-cutting, commercial logging, managing all timber stands in the forest, the more than adequate stream protection, wise herbicide use, and the continue recreation use. I personally want Jackson State restored to a working demonstration redwood forest that is also profitable to the State of California.
- 2 I fully support approval of the draft environmental document (Draft EIR) Alternative C1. The JDSF is set up for natural resource scientists to test hypotheses and conduct demonstration projects to help California forestry meet new challenges and reclaim its ability to compete in the global market place. Scientists need a management plan with maximum operational flexibility, while still protecting important values such as old growth, water quality and fish/wildlife habitat.
- 3 The Draft EIR concludes that the state's proposed logging plan (Alternative C1) can be carried out with "less than significant environmental impacts." I also support this conclusion.
- 4 The draft environmental document is comprehensive and I was able to review it thoroughly. It's 1500+ pages make the electronic version very easy to use, and the printed copies are expensive to buy - over \$200 per copy, but it is worth it!
- 5 The Draft EIR (C1) totally meets its legal obligation to provide the information and analysis I need to be able to make an informed judgment on the environmental effects of the proposed management plan relative to other alternatives.

Sincerely,
Michael Bates
Michael Bates

cc:
Senator Sam Aanestad
Mendocino County Board of Supervisors
Assembly Member Doug La Malfa
Governor Arnold Schwarzenegger

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-31

Response to Comment 1

Support for Alternative C1 noted. Alternative G was developed by blending the elements and management strategies of several Alternatives, including Alternative C1. The management plan reflects the intent of the legislative mandate for the State Forest. It is the Board's intention, through adoption of the management plan, that JDSF be restored to a working demonstration forest that produces revenue for the State.

Response to Comment 2

The Board agrees that management of the Forest can serve as a research laboratory and forest management demonstration, while retaining management flexibility and protecting public trust resources. The management plan will serve these purposes.

Response to Comment 3

The Board has found that the DEIR/RDEIR demonstrates that the proposed management of JDSF will not result in significant environmental impacts.

Response to Comment 4

The Board agrees that the DEIR is comprehensive, which necessarily results in a lengthy document and a substantial reproduction cost (see also General Response 5).

Response to Comment 5

Please see Response 3 above.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-32

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FE 2 7 2006

BOARD OF FORESTRY
AND FIRE PROTECTION

Michael Goodner

22104 Lippencott Ct., Burney, California 96013

February 02, 2006 10:27 AM

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

Subject: Jackson State Forest

Dear Members Board of Forestry:

I strongly support the proposed management plan for Jackson State Forest. I support the plan's clearcutting, large-scale commercial logging, cutting of the oldest second-growth stands, the more than adequate stream protection, herbicide use, and a plan to for existing recreation. I personally want Jackson State managed as a demonstration forest with not more than 25% of the area managed as an old growth redwood forest for habitat, recreation, education and research.

I support Alternative C.

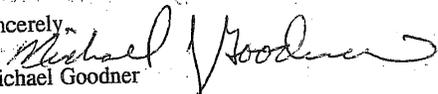
The draft EIR rules out Alternative E as a feasible alternative, saying it is contrary to state law and Board of Forestry policy. This makes the EIR process work in the real world.

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 very true.

The draft environmental document is so huge and obscure but I still am able to review it thoroughly. It's 1500+ pages make the electronic version impossible to use, and the printed copies are too expensive to buy - over \$200 per copy! This is a bad thing for enviros who have partaken of too many drugs.

The Draft EIR totally meets 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,


Michael Goodner

Mailed Letter P-32

Response to Comment

See P-31 above. In addition, please see General Response 2. The allocation of stand types at JDSF is based upon consideration of the enabling legislation, Board policy, and existing regulation. The planned allocation of forest area to late-seral forest protection and development does not preclude the development of a vast array of stand conditions that are suitable and available for demonstration of timber production and other forms of active management research. Most of the forested area of JDSF, including the area designated for late-seral forest development, will remain available for management that will help create, maintain, or enhance the values for which those areas were designated. See also General Response 8 and 9.

P-35

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FEB - 9 2006

BOARD OF FORESTRY
AND FIRE PROTECTION



Sheryl Smith
15555 Hearst Road
Willits, CA 95490-9235

George D. Gentry, executive officer
Board of Forestry & Fire Protection
P.O. Box 944246
Sacramento, CA 92444-2460

Dear Mr. Gentry:

Regarding the draft plan for the future
of the Jackson State Demonstration
Forest:

I please

Why? Because it best protects water—
the next most valuable resource. Also,
it takes the long view. We have plenty of
examples of what happens in the short
view.

Thank you,
Sheryl Smith

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-35

Response to Comment

Support for Alternative D noted. The DEIR analysis determined that some elements of Alternative D may be inconsistent with the current Public Resources Code, regulations, and Board policy that guide the management of JDSF (see Table VI.1). Alternative G was developed by blending the elements and management strategies of several Alternatives, including Alternative D. This includes accelerated implementation of the Road Management Plan, a reduction in the use of even-age management and clearcutting, 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 DFMP.

The Board and CAL FIRE believe that the ADFMP and DEIR/RDEIR have sufficiently addressed the potential environmental impacts and, in addition, allowed the flexibility needed in a management plan to monitor and adjust management activities as needed. Significant impacts to water quality due to management as approved by the Board are not expected to occur (see General Response 11). Please refer DEIR Section VII.10 and VIII.4 for a detailed analysis. See also General Response 2.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-36

George Gentry, Executive Officer
California State Board of Forestry and Fire Protection
P. O. Box 944246
Sacramento, CA 94244-2406

Feb. 6, 2006

RECEIVED BY

FEB - 9 2006

BOARD OF FORESTRY
AND FIRE PROTECTION

Dear Mr. Gentry,

Please see the following comments on the Jackson Demonstration State Forest Draft EIS.

First let me say I think it is a well done and very complete document. The different options and their consequences are well described. I believe option C - 1 is the most appropriate option for the Board of Forestry to choose. My reasons are:

- 1 1. This option best fit's the existing Board policies, Public Resources Code provisions and regulations. It provides for management of the forest to achieve maximum sustained production of high quality forest products while giving consideration to recreation, Watershed, wildlife, range and forage, fisheries and aesthetic enjoyment. In fact it provides for increased consideration of all of these factors including development of a late-seral forest component. It, through the management plan, sets out future desired stand conditions and out lines how they will be achieved. It also provides for enhanced stream protection and restoration as well as enhanced wildlife considerations. It provides for a variety of stand conditions allowing for increased opportunity for research and demonstrational projects.
- 2 2. Option C-1 provides for the best mix of economic, social, and environmental factors. By doing what is mentioned above it protects the environmental attributes as well as providing economic values to the county and the community through tax revenues and jobs. This option provides for an annual cut of 31 MMBF and a long-term sustained yield of 45.2 MMBF which provides more return to the county through yield tax and more good paying jobs to the community. The other options, with exception of C-2, provide less.
- 3 3. One of the over-riding social benefits is the example of reducing our states dependence on imported lumber products, products often produced in areas with far fewer environmental considerations than California. This not only true of finished products but of logs as well. There is at least one mill in the county that imports logs on a regular basis. Jackson State Forest may be a small step state wide in reducing this problem but it is the example that counts.

I sincerely urge the Board to adopt option C-1 as their favored option and move Jackson Demonstration State Forest forward after so many recent years of stagnation.

Sincerely,

Donna B. Tilley

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-36

Response to Comment 1

Support for Alternative C1 noted. Alternative G was developed by blending the elements and management strategies of several Alternatives, including Alternative C1. The management plan reflects the intent of the legislative mandate for the State Forest. The State Forest will continue to be a working demonstration of viable and effective forest management, while also promoting long term stewardship. See General Response 2.

Response to Comment 2

Comments noted. The Board is aware of the relative timber production levels presented by the various alternatives included in the analysis. The ADFMP provides similar benefits.

Response to Comment 3

The Board recognizes that the regulation of logging in California incorporates high levels of resource protection when compared to many other timber producing regions, and that California imports approximately 70% of its forest products, with much of that coming from regions with lower levels of environmental protection. The Board supports the idea that by demonstrating forest management that incorporates high levels of resource protection as a viable enterprise that can be economically and environmentally sustainable, JDSF and the other Demonstration State Forests can serve to reduce this problem and can continue to provide at least one example in each forest type within California.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-42

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BOARD OF FORESTRY
AND FIRE PROTECTION



COAST ACTION GROUP
P.O. BOX 215
POINT ARENA, CA 95468

February 6, 2006

Board of Forestry and Fire Protection
PO Box 944246
Sacramento, CA 94244

Subject: Support draft EIR Alternative F

Dear Members of the Board:

1 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. It is this context that brings a heightened urgency to management issues at Jackson.

2 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.

Outline of considerations as basis for Coast Action Group support of Alternative F:

- 3 • Maintains and creates connectivity among the existing older forest areas, including 11 old growth groves, which total 459 acres, some of the largest such groves remaining in Mendocino County.
- 4 • Emphasizes maintaining much of the old second growth forest, roughly 10,000 acres that are 80-120 years of age. By contrast, the CDF-favored plan, Alternatives C1 and C2, would log much of the old second growth in the next ten years, leaving the old growth groves and very small "late seral development areas" as islands in a sea of commercial logging.
- 5 • Recommends that timber production be limited mostly to selection logging, which leaves better wildlife habitat and more natural looking surroundings and generally eliminates the conditions that might trigger consideration of herbicide use. Even-aged management is limited to scientific experiments.

FINAL EIR FOR JDSF MANAGEMENT PLAN

- 6 • Applies federal watercourse protections across the forest that are dramatically more extensive than the standard California rules. This will help Jackson maintain habitat for salmon, which are under siege in the region from destructive land management practices.
- 7 • Designates areas for enhanced protection of the endangered marbled murrelet, a small sea bird associated with old growth forest known to be nesting nearby; and creates habitat development areas specifically with murrelets in mind.
- 8 • Encourages research and demonstrations for small landowners on habitat recovery processes.

Although Alternative E, (Late Seral Emphasis) is designated by the EIR as the environmentally superior alternative, the EIR notes the Alt E plan to turn the whole forest into old growth over time and eliminate logging is not consistent with the legislative mandate for Jackson, which is to demonstrate "maximum sustained production of high quality forest products while giving consideration to values related to recreation, watershed, wildlife, range and forage, fisheries, and aesthetic enjoyment." "Forest products" is defined to mean traditional outputs like timber, poles, etc. Sierra Club sponsored legislation in 2004 that would have changed that mandate. Although the bill passed both the Senate and Assembly, it was vetoed by Governor Schwarzenegger. *Alternative F was created to implement major reforms at Jackson while still being consistent with current law.*

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 in Alternative F, and *finally* put the controversy to rest.

Sincerely,


For Coast Action Group

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-42

Response to Comment 1 and 2

Please see response to Form Letter 6

Response to Comment 3

Significant impacts to wildlife associated with a loss of connectivity are not expected to occur. The finalized management plan proposes to maintain forested habitat throughout JDSF, including the creation of a contiguous 6,803-acre corridor, extending across JDSF from west to east and north to south, composed of Older Forest Structure Zone, the majority of Old Growth Reserves (359 acres), and Late Seral Development Areas (see RDEIR Map Figure 1). In addition, it designates management of riparian zones on Class I and II streams for the development of late successional habitat, including the recruitment and placement of large woody debris. Other areas of the Forest may be managed on an even-aged basis, producing some temporary interruption of local connectivity for some species that are unwilling or unable to cross through or above young forest. However, this is a temporary and insignificant effect. A site-specific wildlife analysis will accompany all projects, including the habitat needs of listed species. Significant impacts are not expected to occur. See also General Response 9, 10 and 12.

Response to Comment 4

Alternatives C1, C2, and F would allow stand management to occur within most second-growth forest stands, but to varying intensities, and utilizing differing ranges of stand management. Actions implemented under the ADFFMP, including timber harvesting, are based on providing a varied landscape with a set of forest structures designed to support a viable research and demonstration program (refer to RDEIR Table II.1). Stand management and logging activity does not necessarily create islands of the old growth groves and late seral development areas, but does alter the structure of the forest temporarily. The Older Forest Structure Zone will link many of the old growth groves and late-seral development areas, as will the watercourse and lake protection zone, which will be managed to develop late seral forest. Logging is the practice of falling and extracting trees from a forested area, generally for commercial purposes. The intended stand management determines the resultant structure of the forest, not the mere fact that an area has been logged for commercial purposes. The management plan provides for management to accelerate late seral and older forest structure development. This management can include logging and the development of commercial forest products. The majority of stand management proposed in areas of older second-growth forest during the coming years will produce temporarily thinned stands of young forest, while maintaining a forest canopy and providing an opportunity for development of multiple canopy layers. These are conditions that are favorable to many species of wildlife. Old growth forest also tends to possess multiple canopy layers, and trees of varying sizes and ages.

Response to Comment 5

The contention that selection logging leaves "better wildlife habitat" is not supported. Selectively harvested stands have unique characteristics of value to wildlife. These stand conditions change as stands develop. Even-aged management can produce highly variable conditions that are also of value to wildlife (see General Response 10). The management plan proposes to create a dynamic and varied matrix of stand conditions of value to a broad range of species.

Aesthetics have been considered. Significant impacts associated with aesthetics are not expected to occur. Please see DEIR Section VII.2 for the assessment of potential effects associated with aesthetics. This protection will be augmented by the creation of the Older Forest Structure Zone, and the addition of acreage to be developed into habitat for the marbled murrelet. It is untrue that selection logging "generally eliminates the conditions that might trigger consideration of herbicide use". While invasive species are quite variable, and their environmental site preferences are not the same, most of the currently known invasive species associated with JDSF can be found along

FINAL EIR FOR JDSF MANAGEMENT PLAN

roadways and in areas of recent soil disturbance. These conditions can be produced by many forms of even-aged and uneven-aged management, including selection management.

Response to Comment 6

Significant impacts associated with the proposed watercourse protection measures are not expected to occur. Please see DEIR Section VII.6.1 for the analysis of potential impacts to aquatic resources within the assessment area. See also General Response 11.

Response to Comment 7

Comment noted. Several of the alternatives provide for the development of additional potential future habitat for the marbled murrelet, including Alternatives C1, C2, D, E, F and G. Alternative G designates an additional 1,549 acres in the area of upper Russian Gulch and lower Big River to late seral development prescriptions specifically intended to recruit habitat for the marbled murrelet (see RDEIR Map Figure 1).

Response to Comment 8

Several of the alternatives considered are likely to produce management that includes provisions for research and demonstration involving habitat recovery and the processes involved, including Alternatives C1, C2, D, E, F and G. See General Response 9 and 12.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-43

February 7, 2006

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BOARD OF FORESTRY
AND FIRE PROTECTION

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

Re: DEIR for Jackson Demonstration State Forest

Dear Mr. Gentry,

I want to submit my comments for this DEIR which is under consideration for approval. The Environmental Impact Report is well prepared and provides a clear evaluation of the impacts of the alternatives as well as providing analysis of the issues associated with forest management. It is comprehensive yet easy to understand. It will be a valuable resource for small forest landowners, like me, by providing scientific analysis of forest management alternatives.

I recommend adoption of Alternative C1 as it supports the environmental findings and recognizes the important role the JDSF plays in forest research. It recognizes the need to balance the uses of JDSF and does not support any single use management program. Alternative C1 also provides the greatest benefit to the greatest number of California residents.

I urge you to vote for Alternative C1 during your deliberations.

Thank you,



Jackie Bozeman
J&B Tree Farm
PO Box 4373
Georgetown, CA 95634-4373

Mailed Letter P-43

Response to Comment

Comments and support for Alternative C1 noted. Alternative G was developed by blending the elements and management strategies of several Alternatives, including Alternative C1. The management plan reflects the intent of the legislative mandate for the State Forest. The State Forest will continue to be a working demonstration of viable and effective forest management, while also promoting long term stewardship. The management plan will provide the benefits outlined in the comment letter.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-45
**ROBIN
GOLDNER, MSW**

Licensed Clinical Social Worker #15873

245 S. Humboldt St., Suite B • Willits, CA 95490 • (707) 459-6673

February 3, 2006

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

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FEB - 9 2006

BOARD OF FORESTRY
AND FIRE PROTECTION

Re: Support for Alternative F for Jackson State Forest

Dear Mr. Gentry:

1 In the past twenty-four years, I have seen the economy of Mendocino County, which was once tied to the extraction of forestry products and fishing, become reliant on sustainable timber production and tourism. Willits and Fort Bragg's retail and hospitality businesses are increasingly dependent on the dollars spent by visitors. That is one reason that the Mendocino County Board of Supervisors, and the City Council of Willits voted to endorse the passage of the California Wilderness Bill, which protects lands near Willits. Mendocino County is fast becoming a respite for the Bay Area.

2 You too have an opportunity to enhance the future economic and recreational opportunities for the region. That is why I urge you to support Alternative F management plan. This plan will provide sustained production of high quality timber products while at the same time help maintain and restore habitat for flora and fauna in our local redwood forests, and limit clearcutting. This plan will incorporate habitat protection, maintenance and creation of new hiking trails, and an advisory committee that is environmentally based.

Please support a sustainable future for Mendocino County.

Sincerely,



Robin Goldner, MSW

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-45

An identical letter was received from Marc Komer. The following serves to respond to both letters.

Response to Comment 1

The Board recognizes the value of sustained timber production and recreation to the local economy. The ADFMP provides for sustainable timber production and recreational opportunities. Please see DEIR Sections III.5, III.6 and VII.14 for the assessment of potential economic and recreational impacts. Also see General Response 14.

Response to Comment 2

Support for Alternative F is noted. The management plan is expected to enhance future economic and recreational opportunities within the region. The plan will also provide for a significant level of sustained timber production, while maintaining and restoring habitat for flora and fauna. Please see DEIR Section VII.6 for the environmental assessment associated with flora and fauna. Clearcutting will be limited (see General Response 10).

The plan incorporates habitat protection, maintenance and creation of hiking trails, and a JDSF advisory committee. The Board has provided for the creation of a JDSF advisory committee, which will advise the Department on implementation issues, and advise the Board on policy issues. There will also be a recreation user group organized to help guide the recreation program (see ADFMP Chapter 3). The Department intends to maintain a broad spectrum of membership, including abundant expertise and knowledge in environmental issues. The JDSF committee is expected to include representation by local government, scientific experts, and the general public. The membership specifics have not yet been determined. This is in addition to the advisory committee for the state forest system as a whole.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-416

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BOARD OF FORESTRY
AND FIRE PROTECTION

Gareth Loy

274 Sausalito St , Corte Madera, California 94925

February 02, 2006 02:32 PM

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

Subject: Jackson State Forest

Dear Members Board of Forestry:

I know Jackson State Forest personally from years of camping there, hiking, and helping repair the Mendocino Woodlands as a volunteer, and I strongly oppose the proposed management plan for Jackson State Forest. How can the state conscience clearcutting and the use of herbicides on this land? This land belongs to the people of California -- you and me -- not to the timber industry. It belongs to the creatures that inhabit it, that have no other home. The State cannot benefit from destroying the recreational and ecological value of this land unless it is motivated by greed of private parties who would benefit at the public's expense. This must be a jobs give-away to the timber industry. These lands are supposed to be held in trust for the greater good, not narrow, unsustainable greed of a few.

- 1 State cannot benefit from destroying the recreational and ecological value of this land unless it is motivated by greed of private parties who would benefit at the public's expense. This must be a jobs give-away to the timber industry. These lands are supposed to be held in trust for the greater good, not narrow, unsustainable greed of a few.
- 2 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.
- 3 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 old growth, but it fails to commit funds to repair or decommission the hundreds of miles of road that are pouring sediment into salmon streams, nor does it provide for actively restoring salmon habit or expanding recreation opportunities.
- 4 The draft EIR rules out Alternative E as a feasible alternative, saying it is contrary to state law and Board of Forestry policy. This makes a mockery of the EIR process.
- 5 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. How can this be that clearcutting 1/3 of the land and use of herbicides will somehow be "less than significant?" What would be significant by this definition? Total clearcutting?

FINAL EIR FOR JDSF MANAGEMENT PLAN

- 6 The draft environmental document is so huge and obscure that I am unable to review it thoroughly. It's 1500+ pages make the electronic version impossible to use, and the printed copies are too expensive to buy - over \$200 per copy!
- 7 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,

Gareth Loy

cc:

Senator Carole Migden
Assembly Member Joe Nation
Mendocino County Board of Supervisors
Governor Arnold Schwarzenegger

Mailed Letter P-46

Response to Comment 1

The management plan proposes to manage specific areas of the forest on a sustainable basis, as a demonstration of sustained timber production in consideration of other resources. The recreational and ecological value of the Forest will not be destroyed. Please review the DEIR for an assessment of potential to impact recreational and ecological values associated with the Forest. Significant impacts are not expected to occur.

Response to Comment 2-4

Please see response to Form Letter 2.

Response to Comment 5

The statement is in error. The management plan does not propose to clearcut 1/3 of the land. As approved, the management plan proposes to allow utilization of even-aged stand management methods in up to 26 percent of the Forest over the next several decades. Very little clearcutting is anticipated (see General Response 10). Even-aged management will be implemented to create stands between 60 and 150 years-of-age, consisting of various forest structure conditions. Please see Sections VII and VIII for the assessment of potential impacts to fish, wildlife, watersheds, and impacts associated with the use of herbicides (see also General Response 6 and 7).

Response to Comment 6 and 7

See response to Form Letter 2.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-49

P.O. BOX 224 • BRANSCOMB, CALIFORNIA • (707) 984-6181
FAX: (707) 984-6631



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FEB - 9 2006

BOARD OF FORESTRY
AND FIRE PROTECTION

February 9, 2006

George D. Gentry
Executive Officer
Board of Forestry & Fire Protection
PO Box 94246
Sacramento, CA
94224-2460

RE: JDSF DRAFT EIR

Dear YG & Board of Forestry:

1 I am writing in support of Alternative D as submitted by the Citizens Advisory Committee. This alternative best represents where the public is today, the science is sound, it demonstrates the appropriate things to the right people and most importantly promotes the vision and leadership needed to sustain a healthy forest products industry in California.

2 As a member of the CAC established by then CDF Director Richard Wilson in 1997, I can tell you that a great deal of thought and cooperation went into our progression. Working with a diverse group, it was very satisfying that we did not have to compromise our principles in coming up with these recommendations.

3 With the resource professionals represented both on the CAC and in advisory capacities, I feel confident that the science our recommendations are based on is sound. JDSF can no longer be managed based on arbitrary volume, or revenue targets set by politicians in Sacramento. Harvest levels must be based on sound forest management, not the other way around.

4 As a demonstration forest, JDSF must reexamine its audience. The future of forestry in California is no longer the old industrial model. If the public needs to know the long term effect of even age management on a large scale, there are ample examples to study on industrial ownerships throughout the State. The future is in demonstrating how you can balance economic viability of keeping forest land in timber production while at the same time maintaining the public trust resources that society depends upon. In fact, these public trust resources can only be maintained if there is a vibrant / healthy forest products industry.

FINAL EIR FOR JDSF MANAGEMENT PLAN

5 The forest products industry in California is at a crossroads. The old industrial model is a thing of the past. The public is demanding that we manage these forest resources for the greatest public benefit. We face low cost global competition in the marketplace that threatens to make California's forest products industry extinct. JDSF has the capacity to create and demonstrate a new paradigm to California's timber producers that will meet the challenge of a new millennium.

6 Alternative D, the recommendation of the CAC is the best proposal put forward to date to get JDSF and the State of California headed down the right road in addressing the challenges I have mentioned. Because we exist in dynamic times, no alternative including Alternative D should be cast in concrete. As science becomes better and the pressures of a global forest products industry come to bear, we must be flexible enough to adapt to the changes coming at us.

7 We now have a historic opportunity to act with the support of the vast majority of concerned Californians. I urge the Board of Forestry to be part of a positive solution by acting in a way that hopefully will get us past the acrimony that has plagued the forest products industry and the management of our forest resources for the past century.

Sincerely;



Art Harwood
CEO
Harwood Products

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-49

Response to Comment 1

Support for Alternative D noted. The DEIR analysis determined that some elements of Alternative D may be inconsistent with the current Public Resources Code, regulations, and Board policy that guide the management of JDSF (see DEIR Table VI.1). Alternative G was developed by blending the elements and management strategies of several Alternatives, including Alternative D. The Board's intent in adopting the management plan is to implement the intent of the Legislature.

Response to Comment 2

The Board recognizes and appreciates the effort made by the committee appointed by Director Richard Wilson.

Response to Comment 3

The committee appointed by Director Wilson was not intended as a technical advisory committee, though the Board recognizes that a significant breadth and depth of technical knowledge was evident in the committee membership. The timber harvest level under the ADFMP 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, while providing a high level of protection for a wide range of forest resource values.

Response to Comment 4

The Board agrees that the State Forest should remain relevant to the needs of timberland owners, and remain a source of information and education for the public. The Board also recognizes the very broad range, and varying objectives of timberland owners in California today. In order to provide for research and demonstration related to a broad spectrum of viable management methods, it is beneficial to maintain a dynamic matrix of forest conditions available for research and demonstration. While even-aged management occurs on private lands, the condition of the stands and availability for study is not assured, nor is the availability of those lands for public study, education, and research.

The management of JDSF will contribute to the maintenance of a healthy forest industry, by contributing forest products, creating revenue, and primarily by providing a demonstration of sustainable forest management.

Response to Comment 5

See Response 4 above.

Response to Comment 6

The Board has proposed to adopt a management plan (ADFFMP) that incorporates many of the provisions set out in Alternative D. Board policy directs the Department and the Board to periodically review and update the management. Adaptive management is an important element of the management plan.

Response to Comment 7

The Board shares in the hope that the management plan will be greeted favorably by the majority of the interested public, and will serve as a model of modern forest management.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-50

PACIFIC AUTO BODY & RENTAL INC.

746 NORTH MAIN STREET
Fort Bragg CA 95460
707-964-5983

January 30, 2006

RECEIVED
FEB 10 2006
BOARD OF FORESTRY

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

Mr. Gentry:

Please accept the Proposed Alternative B EIR 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. In addition the State of California has not been receiving the much needed revenue from the sale of the timber.

The 50,000 + acres of JDSF was donated in the 1950's in order to create a demonstration forest; it has historically been a well managed forest. The purpose and intent of the donor's was to demonstrate and evaluate different methods of logging.

I **encourage** you to accept the proposed Alternative B EIR and return Jackson Demonstration State Forest to an active production forest. The revenue and jobs it will provide are very important to our community, county and our state.

Thank you for your consideration.

Sincerely,

Stacey Bradley

Stacey Bradley
President

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-50

See response to Form Letter 1

Response to Comment

Please see General Response 2. JDSF was acquired for the purpose of demonstrating economic forest management including, but not limited to, logging methods. JDSF will remain a demonstration forest. The Board recognizes the importance of generating revenue to support important management activities as well as its contribution to the local economy. The legislation that provided for establishment of the State Forest makes it very clear that demonstration of maximum sustained timber production is one of the primary purposes of Forest management. A significant level of sustained timber production will occur at JDSF.

The Board developed Administrative Draft Forest Management Plan (ADFFMP) strives to balance the concerns of all Californians while remaining consistent with the legislative mandate and Board policy for the Demonstration State Forest system (see General Response 2).

P-52

Sierra Club Lake Group

PO Box 1011 Kelseyville, CA 95451

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FEB 10 2006

BOARD OF FORESTRY

February 6, 2006

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

Re: Jackson State Forest EIR and Management Plan

- 1 [The Sierra Club Lake Group strongly opposes the Preferred Alternatives in the draft EIR for Jackson State Forest. These would permit extensive clearcutting, industrial-strength commercial logging, destruction of pristine second-growth stands, and increased applications of herbicides, while doing nothing to reverse the degradation of the Forest's waterways and ignoring opportunities to expand low-impact recreational uses. Instead of being sacrificed for the transitory profit of certain favored extractive industries, Jackson State should be managed for habitat, recreation, education, and research, with the ultimate goal of restoring it as an old growth redwood forest.
- 2 [The draft EIR fails even to consider the restoration alternative in a comprehensive manner; although Alternative E does promote old growth restoration, it fails to fund the repair or decommissioning of hundreds of miles of roads that currently degrade forest streams, much less pay for restoration of salmon habitat or expand opportunities for recreation. Alternative E, limited though it be, is moreover ruled out as "infeasible," while the massive logging proposals in Preferred Alternative C are absurdly deemed to have "less than significant environmental impacts."
- 3 [Public oversight and comment has furthermore been unreasonably restricted by the size (1500 pages), obscurity, and expense (\$200) of the draft environmental document itself. Thorough review of such a ponderous tome is extremely difficult, and in its electronic version to all intents and purposes impossible. Therefore we protest the entire process, on the grounds that the legal obligation under CEQA to provide the facts and analysis needed for an informed judgment has not been met.

Yours sincerely,



Victoria Brandon

Chair, Sierra Club Lake Group

cc: Governor Arnold Schwarzenegger

State Senator Wes Chesbro

Assemblymember Patty Berg

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-52

See Response to Form Letter 2.

Response to Comment 1

The comment incorrectly characterizes the management plan. The management plan does not propose "extensive clearcutting" (see General Response 10). The management plan does not propose to destroy "pristine second-growth stands", but to manage on a sustainable basis in these stands, managing most of them on a selective basis. These stands originated from historic clearcuts, and are in various stages of development. Herbicide use is expected to remain limited. Any herbicide use will occur as part of a carefully considered and limited program (see General Response 7).

The streams within JDSF are in a state of recovery, and the management plan proposes to promote a continued recovery trajectory (see General Response 11). Low impact recreational opportunities will be maintained and a modest increase in these opportunities is expected to occur (see General Response 14). A significant portion of the Forest will be managed to promote late-seral forest conditions, while also recognizing that legislation establishes timber production as a primary land use of the Forest.

Response to Comment 2

The DEIR includes the assessment of a broad range of alternatives in an appropriate manner (see General Response 4). The Board agrees that Alternative E has a lesser potential relative to some of the other alternatives to create revenue to support some restoration activities. The management plan combines some elements of several alternatives to arrive at a management plan that will implement the intent of the Legislature and the Board's policies. The Board determined that some elements of Alternative E may not comply with existing law and policy. The writer is encouraged to review the analysis presented in the DEIR for an assessment of potential impacts associated with the management plan. Significant impacts are not expected to occur.

Response to Comment 3

The DEIR is comprehensive, which results in a relatively large document with a corresponding cost of reproduction. The DEIR is available electronically separately by section, and is also available for review at several libraries and CAL FIRE offices. The EIR and management planning process are in full compliance with CEQA. See also General Response 3 and 5.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-53

Autumn R. Kruse
422 Evelyn Avenue, Apt. F
Albany, California 94706

February 7, 2006

RECEIVED

FEB 10 2006

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

BOARD OF FORESTRY

Re: Jackson State Forest

Dear Sir or Madam:

I strongly oppose the proposed management plan for Jackson State Forest, which allows 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 want Jackson State restored to an old growth redwood forest for habitat, recreation, education and research!

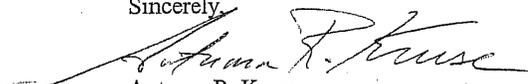
The Draft EIR document is huge (1500 + pages!) and byzantine. A printed copy costs more than \$200. Because of this the Draft EIR fails to meet its legal obligation to provide the information and analysis I need to be able to make informed judgments.

However, it looks as though the Draft EIR's only reasonable alternative (Alternative E, which STILL doesn't commit funds for repairing the miles of road that pour sediment into salmon streams or for actively restoring salmon habit) has been rejected as "contrary to state law and Board of Forestry policy". This turns the EIR process into a joke. 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 crazy and they know it.

1
2
Please reject the Draft EIR. There is no reason logging can't be done sustainably, but logging old growth redwoods is by definition unsustainable. Please do not trust these short-sighted lumber companies to shepherd this resource. They have shown over and over that they prefer a dollar today to assets for the next generation.

Thank you for your time.

Sincerely,


Autumn R. Kruse

Cc: Governor Arnold Schwarzenegger
Mendocino Country Board of Supervisors
Senators Barbara Boxer & Diane Feinstein
Assembly members Loni Hancock & Don Perata

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-53

See Response to Form Letter 2.

Response to Comment 1

The management plan proposes to preserve the existing old growth groves within the Forest, and to protect individual large old growth trees and those old trees with unique structural attributes of value to wildlife. In addition, the plan proposes to devote a significant portion of JDSF forest to management intended to develop late-seral and older forest characteristics. Please see also General Response 2, 8 and 9.

Response to Comment 2

Authority to draft the management plan is vested in the Department of Forestry and Fire Protection. The Board must approve the management plan. Lumber companies do not manage the State Forest or its resources.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-54

February 8, 2006

Ken B. Jones
5 Andrew Way #46
Tiburon, CA

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

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FEB 10 2006
BOARD OF FORESTRY

Dear Mr. Dixon,

1

I think it is important for the state and particularly those in the arca around Mendocino to look at how much money in lost business revenue that will come from how many fewer people will be interested in the area as it loses the beauty that draws people there. But that is only part of what the focus should be. I was so struck by Jackson State Forest when I ran into it by accident years ago that it has been a big reason why I still go up to the Mendocino area from where I live. (As we destroy ecosystems in our attempt to find a quick fix to a budget (sell trees rather than raise taxes even though the polls show people want just the opposite) we get ourselves closer and closer to what happened to the community that lived and died out on Easter Island. What do you think the last resident said when they cut down their last tree (or maybe it was the last group of trees that, when chopped down, made the others unsustainable and caused their demise) Government managers are supposed to be a check against the rush to fill an immediate need at the cost of all the life that comes after us. We elect representatives to stand for what we want. Their appointees are an extension of that mandate. The people in this state do not want more trees clear cutted (How can anyone allow this with what we know of what that procedure does to the land?) They will pay more in taxes to keep that from happening. They will throw out government officials that are elected and do not follow their wishes.

2

I strongly oppose the proposed management plan for Jackson State Forest. It is just one more attempt to whittle away what little we have left of our life sustaining forests.. I oppose the plan's clear cutting, 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.

3

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

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

FINAL EIR FOR JDSF MANAGEMENT PLAN

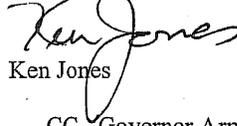
The draft EIR concludes that the state's proposed massive logging plan (Alternative C) can be carried out with "less than significant environmental impacts." Exactly how did we come to this conclusion???

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! Which trees were cut down to make this report?

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

Finally I want to thank the Mendocino Board of Supervisors for their stand on wanting to keep their County a beautiful resource for all of us in the state. They are doing their jobs. Now you need to do yours.

Sincerely



Ken Jones

CC. Governor Arnold Schwarzenegger
Joe Nation, State Assemblyman
Carole Migden, State Senator
Mendocino Board of Supervisors:
Kendall Smith; J. David Colfax; Hal Wagenet; Jim Wattenburger; Michael
Delbar

Mailed Letter P-54

See response to Form Letter 2

Response to Comment 1

The potential for impacts to aesthetics and the local economy have been considered. With mitigation, significant impacts are not expected to occur. Please see DEIR Sections VII.2 and III.5.

Response to Comment 2

The primary intent of management of the State Forest is not the production of revenue for the State, though the demonstration of economical forest management is a primary purpose of the state forest. The intent of Forest management is clearly laid out in the enabling legislation and in the policies of the Board. See also General Response 2.

Response to Comment 3

The management plan appropriately reflects existing legislation, policy and regulation. The wishes of the majority of citizens within the State of California, relative to individual potential elements of forest management, is unknown, though the Board recognizes that many people do not favor the practice of clearcutting. The practice of clearcutting will be restricted (see also General Response 10).

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-59

Paul Ederer
31400 Little Valley Rd.
Ft. Bragg, CA 95437

1/30/2006

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

RECEIVED
FEB 10 2006
BOARD OF FORESTRY

RE: Jackson State Forest Draft Environmental Impact Report

Dear Mr. Gentry

1 I am writing to support the adoption of alternative C-1 in JDSF's DEIR released for public comment in early 2006. As a forester working for 15 years in California's redwood region with two years working for the State on JDSF, I have seen many changes in how this important renewable resource has been managed. 2 The recent cessation of active management on JDSF has hindered the State's ability to test new regulations and validate existing ones in a research environment. Good scientific information that can be used for the benefit of all Californians is needed and Alternative C1 provides managers the flexibility to adapt to or test ever-changing regulations while still providing for the protection of fish and wildlife.

3 The pressure to convert California's forestland to more profitable subdivisions is increasing. JDSF is the only publicly owned forest in the redwood region where large scale, long term studies can be reasonably accomplished to benefit the many different owners of redwood trees. This information can help landowners manage their lands better and avoid selling for non forest uses.

4 The tourist economy has been trumpeted as the golden egg for our local community to crack open. However, wages in the tourist industry are too low to maintain a livable income let alone purchase a decent house in our area. Families are leaving Ft. Bragg in search of affordable housing and a lower cost of living. Alternative C1 helps keep the higher paying logging and milling jobs local. Community stability cannot rely on the whim of the tourist dollar.

5 I feel that Alternative C1 provides a variety of active and passive management techniques across the landscape so JDSF can keep abreast of the many demands placed on the forest by the human and non-human residents of the State. Keeping the "Demonstration" in the forest is essential to perpetuating the original vision, and allows a unique opportunity for the citizens of the State to learn about their environment that more restrictive alternatives cannot provide.

Thank you for your consideration,



Paul Ederer
Registered Professional Forester #2509
Agricultural Advisor #2124

Mailed Letter P-59

Response to Comment

Please see response to Mailed Letter P-6.

P-60

**ROGERS
FOREST
MANAGEMENT**

1525 Glenwood Drive
Ukiah, CA 95482
(707) 463-0356

RECEIVED
FEB 10 2006
BOARD OF FORESTRY

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

February 8, 2006

Re: Comments on Jackson Demonstration State Forest DEIR

Dear Mr. Gentry;

I am submitting the following written comments for the Board of Forestry in consideration for the final EIR of the Jackson Demonstration State Forest (JDSF).

1 After reviewing the Draft Environmental Impact Report, I have decided to support the preferred alternative C 1. This alternative is not only responsive to the legislative intent for JDSF to be a working, demonstration state forest, but also promotes long term forest stewardship. Alternative C 1 offers greater economic, ecological and social benefits than any others under consideration.

2 Alternative C1 is working towards a long-term desired future habitat, watershed and growing stock conditions, while also toward a high level of timber production and maintaining recruitment habitat needed for listed and other species of concern. Other benefits of this alternative include a road management plan to reduce sedimentation, the enhancement of demonstration capabilities and the potential increase in recreation facilities.

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-60

Response to Comment 1

Support for Alternative C1 noted. Alternative G was developed by blending the elements and management strategies of several Alternatives, including Alternative C1. The management plan reflects the intent of the legislative mandate for the State Forest. The State Forest will continue to be a working demonstration of viable and effective forest management, while also promoting long-term stewardship.

The Board developed Administrative Draft Forest Management Plan (ADFFMP) strives to balance the concerns of all Californians while remaining consistent with the legislative mandate and Board policy for the Demonstration State Forest system. The analysis process examined individual alternatives with varying benefits associated with economic, ecological, and social values.

Response to Comment 2

Please see General Response 2. The ADFFMP also provides for these current and future values, and includes a road management plan and an enhancement of research and demonstration opportunities and capabilities (see General Response 2). The management plan will provide for a modest increase in recreational opportunities (see General Response 14).

Response to Comment 3

The Board agrees that JDSF is not a park, while it provides many similar values and opportunities. It is the Board's intent, through adoption of the management plan, that JDSF remain a productive forest that makes a significant contribution to the local economy.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-66

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

RECEIVED
FEB 10 2006
BOARD OF FORESTRY

February 7, 2006

Dear Sir:

1

I am writing this letter to voice my support for resuming active management of the Jackson Demonstration State Forest (JDSF) as described in the current Draft Environmental Impact Report (DEIR), alternative C1, being considered by the Board of Forestry. As a registered professional forester in California, I am well aware of the many public benefits that can result from proper forest management.

2

When the State of California acquired Jackson State Forest in 1947, it had been heavily logged over a span of 80 years. Once acquired, it was managed under sustainable forestry practices to provide research and recreational opportunities, fish and wildlife habitat, and timber. This mission has been successfully implemented over the past 50 years as evidenced by the numerous campgrounds and demonstration trails, significant research such as the Casper Creek watershed study, abundant fish and wildlife, and use of timber revenue to fund essential state forestry programs including state nurseries and the California Forest Improvement Program (CFIP). Not only has active timber management helped make this possible but it has done so while increasing the standing timber volume 160%! Alternative C1 of the DEIR allows for growth to exceed harvest, ensuring the continuation of healthy forest conditions on JDSF, while providing these other vital public benefits.

3

The emotional outcry to save the "old growth" forests of JDSF is its best defense in demonstrating the success of active forest management, particularly when one compares the stand conditions of 1947 to today. You cannot admire the beautiful second growth redwood without acknowledging, and supporting, the role of continued forest management in maintaining these stands and their associated public benefits. I strongly encourage the Board to support active management of JDSF by selecting alternative C1.

Thank you for your consideration of these comments.

Sincerely,

Mark Pustejevsky

Mark Pustejevsky
RPF #2583
545 North Fairfield Ave.
Susanville, CA 96130

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-66

Response to Comment 1

Support for Alternative C1 noted. The Board strongly supports a return to full and active management of JDSF. Many provisions of Alternative C1 have been adopted by the Board and are included in the management plan. 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 ADFMP contains elements from several alternatives and is designed to balance demonstration and research, production of timber products, and the desires of the public, while improving the overall health and ecosystem function of the forest (see also General Response 2).

Response to Comment 2

The Board recognizes that the management of the Forest has produced a variety of public benefits, including research, recreation, habitat and timber. The management plan will provide for a continued increase in standing timber volume, with growth exceeding harvest. The Forest will continue to be managed to promote healthy forest conditions while providing many public benefits.

Response to Comment 3

Active forest management is an essential element of the management plan. The Forest serves as a valuable demonstration of sustainable forest management to the public and forest landowners.

FINAL EIR FOR JDSF MANAGEMENT PLAN

Page 1 of 3

P-70

Gentry, George

From: Walter [walter@pacific.net]
Sent: Tuesday, February 07, 2006 1:22 PM
To: Gentry, George
Subject: Comments on the Draft EIR/Management Plan for JDSF

Dear Mr. Gentry,

Please forward my comments regarding the EIR and Management of Jackson Demonstration State Forest below to Mr. Dixon and others on the Board of Forestry

Thanks, Walter

February 6, 2006

Stan Dixon, Chair
State Board of Forestry
P.O. Box 944246
Sacramento, CA 94244-2460

Dear Chairman Dixon,

I am writing to provide comment on the forest management and administrative management of Jackson Demonstration State Forest (JDSF). I am a long time resident of Willits and have been employed in the timber industry for over 30 years. I have worked as a timber faller from 1974 to 1984 and as a logging contractor from 1984 to 1990. During the 1970's and 80's I worked in JDSF (my father worked in JDSF as a timber faller and a logging boss in the 1950's, 70's and 80's) primarily on the eastern half of the forest. From 1989 to 1992 I served on the Mendocino County Forest Advisory Committee. Since 1990 I have worked in the field of forest auditing with a Forest Stewardship Council (FSC) accredited certification body and have been an auditor for over 80 forest management audits in North America and Asia. Many of the forest management audits were on public forestlands. Several private FSC certified lands that I have audited are neighbors to JDSF.

1 Mendocino County is the most directly affected California constituency of JDSF. The Board of Forestry must seriously take into account the social, economic and environmental needs of the county when considering the management of JDSF. JDSF directly affects Mendocino jobs in timber, fishing, and tourism. These jobs are directly connected to sound environmental forest management that emphasizes the long-term maintenance and enhancement of an older forest structure, fish and wildlife habitat, water quality, and aesthetics. These qualities in turn are of the utmost importance to the citizens of California.

2 I would support the Citizens Advisory Committee proposal (Alternative D) because it has the most broad-based public acceptance. I have outlined below what I think are important elements of appropriate management of JDSF given the social, economic and environmental concerns of the citizens of our county and our state. Many of my suggestions will reiterate the Citizen Advisory Committee's recommendations, while others are provided as my personal advise derived from reviewing first hand the management of public forests here in the US and in many foreign countries.

3 **Social/Economic**

- JDSF as a public institution must become more open and transparent in the management of the forest. The public must be invited as a participant/partner in the management of the forest. This

2/9/2006

FINAL EIR FOR JDSF MANAGEMENT PLAN

Page 2 of 3

is both a right of the public and an obligation of JDSF. An ongoing citizen's advisory committee could provide part of that participation. However, every year, prior to planning forestry activities, the public should be informed about what, where, when and why. Field trips should be held. They should be allowed to provide input and suggestions. That input could then be vetted with the citizen's committee and the resulting inputs are incorporated into operational plans. In the long run open public involvement will provide for more productive and acceptable management (I think under the current management, lawsuits have stalled harvesting for several years). Constant vigilance by JDSF and the Board of Forestry is needed to remain transparent and open to the public in order to maintain the social license to operate.

The citizen's advisory committee should be made up of nominations from the Mendocino County Supervisors, The State Board of Forestry and the University of California extension. The Mendocino choices would represent the local community, the Board of Forestry choices would represent state constituents and UC would represent the research and scientific interests.

- 4 • Timber harvests should be completely administered by the JDSF foresters. That means that timber companies no longer hire the loggers. The loggers bid on logging jobs directly with JDSF. Timber harvests should be of multiple sizes and volumes so that the cross-section of logging contractors can bid (some large, some medium, some small).
- 5 • JDSF should operate a log sort yard and auction. This is the fairest, most competitive and potentially the most economically profitable way of selling timber. The log auction should have multiple log grade/species sorts and sale volumes to attract multiple buyers. This would enable micro sawmills and specialty wood workers as well as large primary sawmills to participate. A private sector contractor could bid on running the log sort and auction yard.
- 6 • The income from the timber sales must be put in a JDSF account. After forest management costs are covered, including restoration, a portion of the remainder can go to the general fund. An additional portion should go to a trust fund that would be used in emergencies (fire, for example).
- 7 • Recreation areas need to be developed and enhanced. JDSF, transected by highway 20, has huge potential for recreation and educational opportunities.
- 8 • Demonstration and research regarding participatory forestry, community forest economics, non-timber forest product development and eco-tourism and recreation should be an emphasis of forest management.
- 9 • Take the Scientific Certification Systems FSC preassessment results seriously and make them public. Whether JDSF pursues FSC certification or not, they should be managing to the FSC standards. The FSC standards for the Pacific Coast can be found at www.fscus.org

Environmental

- 10 • JDSF should only employ uneven-aged silviculture. Not only does the public want JDSF to end clearcutting, but also redwood does not regenerate naturally through large stand replacing events. Individual trees topple and small openings are created through wind, landslides and falling trees. Clearcutting is done in the redwood region as an economic way to move volume. JDSF should not make economics a primary decision point.
- 11 • JDSF must stop using herbicides. Industry uses herbicides because they believe that is too expensive to use hand control methods. However, JDSF should be 1) trying to demonstrate alternative methods given that most Californians are against the use of herbicides; 2) trying to maximize employment on the forest and; 3) using silvicultural prescriptions that do not create the need to use herbicides.

2/9/2006

FINAL EIR FOR JDSF MANAGEMENT PLAN

Page 3 of 3

- 12 • Rehabilitate the roads and streams on the forest, particularly the eastern half. JDSF has basically ignored the eastern half of the forest since it stopped harvesting there in the 1980s. These streams and roads are in the headwaters of the Big and Noyo rivers. Roads and landings are in the WLPZs (some actually in the streams). The roads built from the 1950's to 80's are not up to today's standards.

JDSF participated in "stream restoration" in the 1970's where in-stream wood was removed. We know now that this was not an appropriate strategy and in most cases destructive to habitat. Some of the tributaries to Big River had logs washed down to the mill at the town of Mendocino during the late 19th and early 20th centuries. These upland streams are still affected from these events and need habitat enhancement work. Mendocino and Humboldt Counties have knowledgeable and experienced stream and road restorationists who could bid on these projects (and add more employment). This obviously implies a JDSF restoration needs assessment, plan and funding.

- 13 • Develop an old growth retention policy. Old growth trees must off limits to harvesting. A landscape plan should be developed to create connecting corridors between existing old growth patches both on and off JDSF.
- 14 • Harvesting in WLPZs and riparian zones should only be to enhance structure, habitat and sediment filtering qualities. All stream crossings should be evaluated and the best available research and technology should used to repair, replace or abandon them.
- 15 • Demonstration and research regarding landscape ecology, landscape management among multiple landowners, development of stream and road restoration technologies, development of forest structures and habitats that are rare in the redwood ecosystem, non-timber forest management and alternatives to pesticides should be the emphasis of forest management.

Thank you for considering these points. I would glad to be available for further consultation.

Sincerely,

Walter Smith
1794 Hilltop Drive
Willits, California 95490
707.459.0800/ 707.459.0576
walter@pacific.net

2/9/2006

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-70

Response to Comment 1

The Board agrees with these statements. The DEIR provides substantial discussion of social and economic issues related to the management of JDSF (see DEIR Section III). The management plan will provide support to the local economy, while protecting and enhancing values associated with aquatic and terrestrial habitats (see also General Response 11 and 12). The plan also provides for the future development of late seral forest habitat, while providing for maintenance and enhancement of water quality (see also General Response 2, 8 and 9).

The management plan will provide for protection of aesthetic values, especially in areas of high public use, such as highway corridors, high-use recreational areas, and near rural residential neighborhoods. A detailed discussion of Aesthetic Resources, including impacts, thresholds of significance, and mitigation measures can be found in Section VII.2 and VIII.9 of the DEIR. Additional analysis of aesthetics, as related to recreation, can be found in Section VII.14. The Board recognizes that timber operations can lead to negative impacts on the aesthetics of an area, however determining specific "thresholds of significance" is highly personal and subjective (see General Response 6). The DEIR analysis of these potential impacts found that application of several mitigation measures would reduce the potential negative impacts to less than significant.

Response to Comment 2

Support for Alternative D noted.

Response to Comment 3

Please see response to P-45 and General Response 18. Recommendations concerning the constituency of advisory committee membership, while noted and appreciated by the Board, are not an environmental issue. The current Demonstration State Forest Advisory Committee includes local representation by government and environmental interests, as well as representation by the University of California. The JDSF committee is expected to include representation by local government, scientific experts, and the general public. The membership specifics have not yet been determined.

Response to Comment 4

All timber harvest plans are administered by JDSF foresters and all licensed timber operators are subject to the applicable forest practice rules. The Board generally agrees that timber harvest demonstrations should vary in size, and be available to a broad range of log buyers and timber operators. The Board is interested in the concept of using licensed timber operators that are hired and administered by the Department. This is not an environmental issue.

Response to Comment 5

The Board is interested in the concept of public log sales. This is not an environmental issue.

Response to Comment 6

Comment noted. The Board cannot allocate revenue generated by the state forests. The current budget law (Public Resources Code § 4799.13) directs timber revenue from state forests to support of the state forest system. Revenues beyond the needs of the state forests may be shifted to the General Fund.

Response to Comment 7

The Board agrees that there is untapped potential for education in forest management and for recreation. The management plan provides for a modest increase in recreational opportunities, and a user-needs survey to identify additional recreational opportunities. Please see General Response 14.

Response to Comment 8

The Board agrees that there is merit to these values and activities.

FINAL EIR FOR JDSF MANAGEMENT PLAN

Response to Comment 9

Preference for adoption of FSC standards is noted. The Department has initiated the certification process, and has obtained a pre-assessment from both SFI and SCS. If full certification is sought by the Department, it is anticipated that FSC standards will be adopted.

Response to Comment 10

The Board agrees that many people do not favor the use of clearcutting. The use of this regeneration method will be limited (see General Response 10). However, the Board finds value in the continued demonstration and research of even-aged systems, which have merit in terms of stand and habitat management, but also in terms of imitating natural stand-replacing events and processes. Little research has been done to determine the modes and extent of regeneration in old redwood forests, and is likely that a high degree of variability once occurred. Board regulation and management plan provisions restrict the size of even-aged regeneration units.

The use and demonstration of silvicultural systems and stand management methods includes consideration of a broad range of impacts and values, including economics. Economics is a very important consideration in the management of timberland by both state and private entities.

Response to Comment 11

Herbicides may be used as part of an integrated pest management system for the control of invasive weeds (see General Response 7). The Board has selected an approach that treats hardwoods only where specific criteria are met (RDEIR II-1); seeking to minimize the use of herbicides and employ alternative methods. The ecological basis and incorporation of a range of treatment options shares some attributes with Integrated Pest Management for invasive weeds. The JDSF approach to invasive weeds will be prevention oriented, ecologically based program will utilize a combination of control methods and the use of herbicides will be minimized by using them primarily where cost and effectiveness precludes the use of non-chemical control approaches.

The use of herbicides within JDSF has been low relative to that utilized by large forestland owners in the region. Please see DEIR Section VII.8.2 for the assessment of potential for impacts associated with herbicide use. Employment is a consideration in the management of JDSF, but not the only one. In an operational context, herbicides will be used only when no other effective and feasible control methods are found after consideration of the scope of the problem, opportunities to effectively manage the situation and available alternatives and their potential effectiveness, costs and risks. The plan includes commitments to examine alternatives to herbicides.

Both silvicultural prescriptions and harvesting methods can affect the need for herbicide use. The DEIR/RDEIR details how changes in post harvest activities have reduced the need for herbicide use. The ADFMP includes provisions for consideration of this aspect of stand management, and includes a stated intention to manage in a way that reduces the need for herbicide use.

Response to Comment 12

The management plan includes provisions to inventory the road system within the Forest, and to prioritize maintenance, improvement, and selective road decommissioning activities (see also General Response 13). The Department recognizes the basic condition of many roads and landings in areas that were roaded and logged decades ago. A significant level of restoration and improvement is anticipated during the coming decade.

The Department is aware of the condition of aquatic and riparian zones within the Forest. The management plan includes provision to manage the WLPZ to develop late seral forest conditions, and to maintain or restore ecological function to these areas (see also General Response 11).

Although the Board does not directly control the operating budget of JDSF, the Board is aware of the need for funding to appropriately manage the Forest. Based upon the recent adoption of a Budget Change Proposal (2006), the level of operating funds that can be made available for road

FINAL EIR FOR JDSF MANAGEMENT PLAN

management and improvement will be substantial, contingent upon the flow of harvesting revenues from JDSF to the Forest Resources Improvement Fund.

Response to Comment 13

The management plan will provide for connectivity between old growth stands on JDSF, consisting of forested area in various stages of development and with variable structural characteristics, including the creation of a contiguous 6,803-acre corridor, extending across JDSF from west to east and north to south, composed of Older Forest Structure Zone, the majority of Old Growth Reserves (359 acres), and Late Seral Development Areas (see RDEIR Map Figure 1). In addition, it designates management of riparian zones on Class I and II streams for the development of late successional habitat, including the recruitment and placement of large woody debris. The management plan includes provisions to preserve the mapped old growth groves, individual large old growth trees, and old growth trees with unique structural attributes of value to wildlife. See also General Response 8, 9, and 12. Please see DEIR Section VII 6.6 for the assessment of potential impacts to terrestrial species.

Response to Comment 14

The Board generally agrees with these statements. See General Response 11. The WLPZ will be managed to develop late seral habitat conditions, although the Board also recognizes that some level of timber production can occur coincidental to habitat development. Stream crossings will be evaluated as provided in the Road Management Plan (ADFFMP, Chapter 3). Stream crossings will be managed through utilization of good science and technique.

Response to Comment 15

The Board agrees that these are areas that should be integral to research and demonstration, and management of the Forest. However, the management plan will also provide for other management goals, as stated in the enabling legislation and Board policy.

FINAL EIR FOR JDSF MANAGEMENT PLAN

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DEFENDERS CA OFFICE

PAGE 01

P-73



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FEB - 9 2006

February 9, 2006

Board of Forestry and Fire Protection
PO Box 944246
Sacramento, CA 94244

BOARD OF FORESTRY
AND FIRE PROTECTION

Re: Jackson Demonstration State Forest - Support draft EIR Alternative F

Dear Members of the Board:

Program Office
2225 Street
Suite 170
Sacramento, California 95814
Telephone 916-313-5800
Fax 916-313-5812
www.defenders.org/california

On behalf of Defenders of Wildlife and our more than 90,000 members and supporters in California, I am writing to urge you to adopt Alternative F, the "Older Forest Emphasis" plan for management at Jackson Demonstration State Forest.

While we understand logging will take place at Jackson, clear-cutting is not an acceptable practice for an area of such ecological importance. There is less than two percent of protected redwood forests in the Central redwood region encompassing Mendocino, Sonoma and Marin counties. The public is not going to tolerate large-scale clear-cutting of our largest public redwood forest. CDF needs to focus on demonstrating restoration forestry, creating habitat, recreational opportunities, and doing meaningful scientific research.

Jackson is a critical resource in the region. For example, the National Marine Fisheries Service recently upgraded the Central Coast Coho from Threatened to Endangered, and Jackson is the only large chunk of public land in the region that can be managed to contribute to Coho recovery. Alternative F applies federal watercourse protections across the forest that will help Jackson maintain habitat for salmon.

This alternative also designates areas for enhanced protection of the endangered marbled murrelet, a small sea bird associated with old growth forest that is known to be nesting nearby. Additionally, the emphasis on maintaining and creating connectivity between old growth and old second growth is key to providing much needed corridors for many wildlife species.

This issue is of statewide concern, and the public is looking to the Board to provide clear direction to CDF to resolve this long-running controversy. We believe that by adopting Alternative F, you will strike a balance between producing high quality forest products while also protecting other key forest values, such as protection of water quality, wildlife habitat, and recreational opportunities.

For all of these reasons, we urge you to adopt Alternative F. Thank you for your consideration.

Sincerely,

Kim Delfino
California Program Director

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FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-73

Response to Comment 1

Support for Alternative F noted.

Response to Comment 2

While the commenter states that clearcutting is not appropriate, no environmental concern is stated in support of this position. The Board has significantly restricted the future use of clearcutting on JDSF (see General Response 10). While the commenter does not define the stated term "protected redwood forest," it should be noted that the JDSF is protected from development or conversion to agricultural uses such as vineyards. The Board recognizes that there is less area in park and preserve in this portion of the range of redwood than within areas to the north and south. The DEIR provided detailed information on redwood forestland in public park status throughout the redwood region (see DEIR Section VII.14). The potential for environmental effect was considered within a broad assessment area. Please also see response to Form Letter 6.

The research and demonstration program at JDSF will include restoration, habitat creation, and other forms of meaningful scientific research. Recreation and a demonstration of the compatibility between recreation and forest management will also be an important aspect of management.

Response to Comment 3

The Board recognizes the importance of JDSF in terms of contribution to direct protection of listed species, and also with regard to demonstration and research for the benefit of these species. JDSF is one of several relatively large public properties that can be managed to contribute to the recovery of listed species. Other local public properties include the various forested state and local parks, national forests, and lands administered by the Bureau of Land Management.

The management plan will include a high level of protection for aquatic habitat, and will provide for continued recovery of this valuable resource. Please see DEIR Section VII.6.1 for the assessment of potential impacts to aquatic species. See also General Response 11.

Response to Comment 4

Alternative G and the ADFPMP designate a significant area of forest to be managed to maintain or develop additional habitat for the marbled murrelet.

The management plan will provide for connectivity between old growth stands on JDSF, consisting of forested area in various stages of development and with variable structural characteristics, including the creation of a contiguous 6,803-acre corridor, extending across JDSF from west to east and north to south, composed of Older Forest Structure Zone, the majority of Old Growth Reserves (359 acres), and Late Seral Development Areas (see RDEIR Map Figure 1). In addition, it designates management of riparian zones on Class I and II streams for the development of late successional habitat, including the recruitment and placement of large woody debris. The management plan includes provisions to preserve the mapped old growth groves, individual large old growth trees, and old growth trees with unique structural attributes of value to wildlife. See also General Response 8, 9, and 12. Please see DEIR Section VII 6.6 for the assessment of potential impacts to terrestrial species.

Response to Comment 5

The Board has proposed a management plan (ADFFMP) that incorporates provisions of Alternative F, and provides a balanced management approach for JDSF.

FINAL EIR FOR JDSF MANAGEMENT PLAN

22/12/2006 12:48 7074637114

STAPLES

PAGE 01

P-74

FEB. 11, 2006

MR GEORGE D. GENTRY
EXECUTIVE OFFICER
BOARD OF FORESTRY & FIRE PROTECTION
PO BOX 944246
SACRAMENTO, CA 94244

DEAR MR. GENTRY,

I HAVE REVIEWED THE DRAFT ENVIRONMENTAL IMPACT REPORT OF THE JACKSON DEMONSTRATION STATE FOREST, AND AM SUBMITTING MY COMMENTS TO BE CONSIDERED BY THE BOARD OF FORESTRY AND FIRE PROTECTION.

1

I STRONGLY SUPPORT THE RESUMPTION OF ALL FOREST MANAGEMENT ACTIVITIES ON THE JDSF AS AN INTRICAL PART OF THE RESEARCH AND DEMONSTRATION MISSION. I SUPPORT C 1 AS THE BEST OPTION TO MEET THE LEGISLATIVE INTENT FOR THE JDSF.

2

YOU, AS THE STATE BOARD OF FORESTRY & FIRE PROTECTION, HAVE THE OBLIGATION TO PROTECT THE VIABILITY OF FORESTRY AND SOUND MANAGEMENT OF CALIFORNIA'S FOREST LAND RESOURCES. THE HARVESTING OF TIMBER IS CRITICAL TO MEETING THESE OBJECTIVES ALONG WITH MAINTAINING A HEALTHY FOREST. EVERYTHING POSSIBLE MUST BE DONE TO INCOURAGE INDIVIDUALS TO HOLD TIMBERLAND FOR TIMBER PRODUCTION. THE

3

ALTERNATIVES DO NOT CREATE A PLEASANT PICTURE FOR ME, IT IS LIKELY TO RESULT IN FRAGMENTED OWNERSHIP AND DEVELOPMENT THAT WILL HAVE A FAR GREATER IMPACT ON CRITICAL HABITAT AND THE NON-TIMBER

FINAL EIR FOR JDSF MANAGEMENT PLAN

02/12/2006 12:48 7074637114

STAPLES

PAGE 02



3 RESOURCES THAT WE CAN BETTER PROTECT AND ENHANCE WITH SOUND FOREST MANAGEMENT. IN ADDITION FOREST LAND FRAGMENTATION SIGNIFICANTLY IMPACTS CDFP'S RESOURCES IN ITS MISSION OF FIRE PROTECTION. NOT ONLY WILL THERE BE MORE STRUCTURE IN THE FOREST

4 LANDS TO PROTECT, BUT AS OUR TIMBER INDUSTRY DOWNSIZES CDFP IS LOSING A VALUABLE ALLY WITH WILDLAND FIRE FIGHTING RESOURCES.

5 I AM NOT GOING TO BURDEN YOU WITH THE DETAILS OF THE ECONOMIC VALUES THAT A STRONG FOREST PRODUCTS INDUSTRY HAS TO RURAL CALIFORNIA, BUT IT NEEDS TO BE GIVEN STRONG CONSIDERATION WHEN YOU DECIDE THE FUTURE DIRECTION OF JDSF AND ITS MISSION TO DEMONSTRATE SOUND FOREST MANAGEMENT PRINCIPLES AND THE VALUES OF LONG TERM FOREST STEWARDSHIP.

THE ADOPTION OF OPTION C1 WILL SEND A MESSAGE TO INVESTORS IN CALIFORNIA FORESTLAND, FOR TIMBER PRODUCTION AND RESOURCE PROTECTION, THAT THEY HAVE THE STRONG SUPPORT OF THE BOARD OF FORESTRY.

Sincerely,
J.M. Anderson
JAMES M. ANDERSON RPF#771
RETIRED CDF FOREST PRACTICE OFFICER

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-74

Response to Comment 1

Support for Alternative C1 noted. Alternative G was developed by blending the elements and management strategies of several Alternatives, including Alternative C1. The management plan reflects the intent of the legislative mandate for the State Forest. The State Forest will continue to be a working demonstration of viable and effective forest management, while also promoting long term stewardship.

Response to Comment 2

The Board agrees that the primary purpose of the State Forest is to serve as a demonstration of viable and productive forest management to private timberland owners.

Response to Comment 3

The Board recognizes the problem of increased forest fragmentation and loss of productive timberland due to the economic pressures to convert the land to other uses. The Board is obligated to consider a range of alternatives in the environmental analysis process. The range of alternatives closely mirrors the range of public and agency comments that the Board has received relative to future management of the Forest. Please see General Response 4 for more detail. The management plan will provide both a useful demonstration and valuable source of information to private timberland owners, providing an incentive to maintain their lands in timber production and other forms of active management.

Response to Comment 4

The Board agrees that fragmentation of timberland ownership can reduce the level of resources available for fighting fire.

Response to Comment 5

The management plan provides for a viable demonstration of economic and productive forest management, and will make a significant contribution to the local economy. Economics has been considered in detail (please see DEIR Section III.5 and III.6).