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Chairman Stan Dixon
Members
California Board of Forestry
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Additional Comments on
Draft EIR for Jackson Forest Management Plan

Dear Chairman Dixon and Members of the Board:

Having a couple of minutes left, I am offering some additional comments on issues that are of concern.

Mushroom Management

On page VII.6.2-10 there is a discussion of mushrooms and other fungi, the use of Jackson by the mushroom-interested scientific community, scientific literature that was generated from research at Jackson, and other related issues.

There is attached to this discussion, a map of the Mushroom Corners area, Figure VII.6.2.1, which in the key shows a "Mushroom Management Area." The text of this section does not mention a specific "mushroom management area." I quickly paged through the Forest Management Plan but could not find mention of such a mushroom management area. Is the inclusion of map Figure VII.6.2.1 to be taken as a commitment that there be a mushroom management area at the mapped location? If yes, what provisions will be put in place to protect the mushroom resources there?

Class II and Class III Watercourse Protection Needs Augmentation

Beginning on Page VII.6.1-6 there is a good discussion of the function and importance of headwater stream systems to both sediment production and amphibian habitat. It provides strong justification for highly protective aquatic measures for Class II and Class III watercourses. Yet, the FMP Habitat Protections outlined in VII.6.1.12 on Page VII.6.1-91 indicate protections for Class IIs are only modestly improved on standard FPRs, including a WLPZ that may be as narrow as 50 feet. This would be in contrast to the National Marine Fisheries Service recommendations of 180 feet in this region. The FMP proposed management measures include some tree retention, but a significant amount of logging in the 50-

100 foot Class II WLPZ, particularly outside the first 25 feet of the zone. This contrasts with the NMFS Guidelines for *no harvest except to accelerate late seral conditions in the full 180 feet on each side of a Class II stream.*

Class III fares predictably worse in the FMP. The only difference between standard rules and the FMP proposal is to ensure that there is an equipment exclusion zone of as little as 25 feet on each side of Class IIIs. NMFS Guidelines are for a 30-50 foot *no harvest zone* except for necessary crossings, plus additional measures.

The following excerpt of your own DEIR clearly demonstrates that the NMFS Guidelines are much more appropriate for application on our public lands at Jackson than what is proposed by the FMP. The DEIR fails to provide any sort of justification for the use of the lesser standards proposed by the FMP, especially in light of the information provided about the importance of Class II and Class III to the aquatic systems and dependent species. The DEIR also fails to identify that operations as proposed by the FMP for Class II and Class III will cause a significant negative effect on the environment.

Below, please find your DEIR discussion pasted from Page VII.6.1-6 to VII.6.1-8:

"Headwater Stream Ecosystems-Headwater streams and drainages (Forest Practice Rule Class II and III) are areas that contribute to stream ecosystem function. These areas can represent 60-80% of total channel length in mountainous terrain (May and Gresswell, 2003a). These small streams contribute structural components such as large woody debris, spawning gravels and stream substrate, and invertebrate and detritus inputs. These sites also contribute to water quality and provide for storage of potentially deleterious fine sediment. Similarly, they can have a strong influence on the rates of sediment and wood delivery to larger watercourses, and consequently, habitat value for a variety of aquatic and semi-aquatic vertebrates and other biota (Welsh et al. 1998). Efforts aimed at restoring structural and biotic elements of stream ecosystems must first increase normative conditions in the river system before sustainable species recovery is possible (Williams et al 1999). Management approaches aimed at restoration and management of watershed processes, rather than individual habitat characteristics, may be more effective in developing complex stream channel structure (May and Gresswell 2003b). The underlying assumption is that movement toward restoration of natural processes and levels of sediment production, large woody debris recruitment, and other stream function processes, will be positive for stream biota.

<u>"Disturbance as an Influence on Headwater Stream Ecosystem Structure and Function</u>
Disturbance as an influence on the structure and function of stream ecosystems has been extensively studied and reinforces the concept of the "river continuum" (Vannote et al. 1980). That being that energy and organic material inputs to stream processes change in a predictable way along the stream course from headwaters to downstream reaches. A variety of land uses, including timber harvest and forest management, can influence background erosion and sedimentation regimes, recruitment of large woody debris and other ecological

processes. The delivery, time in residence, and transport of these additional sediments and woody debris influence stream channel conditions and associated biota. Change in vegetation in the vicinity of headwater streams can markedly alter the function of these stream types and those larger stream systems supported. Change in the efficiency of the channel to recharge groundwater, meter trapped sediments and water flow, and process organic material and other nutrients for use by aquatic biota downstream can be expected. Past management practices that reduce local sources of wood and rate of wood recruitment increase the relative importance of wood contributed by debris flows in colluvial tributaries where this means of recruitment occurs.

"Most debris flows in the northern California Coast Ranges originate from zero-order colluvial-filled hollows. Increases in pore water pressures in convergent bedrock topography where soil and colluvium is relatively thick can exceed resisting forces to failure, resulting in debris flow initiation. These features can mobilize down steep channels and pick up additional debris as they travel, forming the characteristic Ushaped, relatively straight channel. The principle influence of vegetation along Class III channels on the mobilization of debris is the presence of in-channel large trees that could slow or stop mobilized sediment and debris under some circumstances or contribute large wood at other times. Because debris flow potential is not universal, WLPZ boundaries cannot be used as a surrogate to actual site inspection for potential zones of failure (T. Spittler pers. comm. 10/28/04).

"The type of disturbance also can have markedly different results on the structure and function of stream and associated riparian ecosystem processes. For example, floods, fire, mass wasting events are generally less frequent and result in large localized changes to stream system, whereas, timber harvest, land conversion, agricultural and urban development are more frequent and regional in effects. Regionally, the "natural" (fire, flood) and man induced (timber harvest, land conversion) disturbance regime within the redwood zone likely exceeds that under which the plant community and associated biota evolved (Reeves et al. 1995; Sawyer et al., 2000). Stream communities, as shaped by past and present disturbance events have led to widespread and long-lasting alteration of stream conditions. Principle among these is alteration of the amount, size, and recruitment of large woody debris and coincident metering of sediments through the stream system. Large woody debris increases the sediment storage capacity of headwater streams. With sufficient wood inputs, low-order channels have the potential of storing large volumes of sediment and are one of the dominant sediment storage reservoirs.

"Headwater Habitat Relationships Because of the small size of headwaters and close connection with uplands, these areas are readily influenced by adjacent land uses. Species that inhabit headwater environments can be especially vulnerable to habitat alteration. These species, amphibians and other taxa, generally achieve higher population densities in headwater habitats. In addition, individual species inhabiting headwater habitats generally exhibit low levels of vagility (mobility) sometimes spending their entire life cycle in a few square meters of habitat. Recolonization of suitable vacant habitat may require extensive periods of time or, lacking movement into vacant habitat, result in local population extirpation.

"Headwater stream reaches, lacking fish populations, provide areas with little or no fish predation pressure to the benefit of several aquatic and semi-aquatic amphibians. Amphibians that breed primarily in stream habitats represent a large component of stream biomass and in the Pacific Northwest may exceed fish in both numbers and biomass (Hawkins et al. 1983). Welsh and Ollivier (1998) examined the impact of sediments on aquatic amphibian densities in coast redwood. Three species were sampled in numbers sufficient to be informative: tailed frog (*Ascaphus truei,* larvae), Pacific giant salamander (*Dicamptodon tenebrosus,* paedomorphs and larvae), and southern torrent salamander (*Rhyacotriton variegatus,* adults and larvae). Densities of amphibians were significantly lower in the streams impacted by sediment. While sediment effects were species-specific, reflecting differential use of stream microhabitats, the shared vulnerability of these species to infusions of fine sediments was probably the result of their common reliance on interstitial spaces in the streambed matrix for critical life requisites, such as cover and foraging."

Road Rehabilitation is Too Slow

According to the DEIR:
"Page VII.15-7
The proposed Road Management Plan (DFMP, Appendix VI: Road Management Plan) specifies that a road inventory will be completed within five years following approval of the Forest Management Plan. This inventory will compile a list of roads for decommissioning, and establish the priorities and schedule for completing this work. The availability of alternative access for management, recreation, and fire control will be a critical factor in deciding whether a road is needed or not."

This is an incredibly modest goal considering the level of consensus regarding the need for upgrading the roads at Jackson. It should not take five years just to do the assessment. It all boils down to how much money the managers at Jackson will be allowed to keep from the proceeds of cutting the public's trees at Jackson. Assuming the forest goes back into production in the foreseeable future, the road inventory should be completed within a year at most and rehabilitation should proceed the next season on the highest priority road segments. Money should not be diverted to other purposes from Jackson's management until the high priority roads are fixed. As far as I can tell, the EIR has not identified the need for an accelerated road rehabilitation plan. Thus, the EIR has omitted a crucial feasible mitigation that has an absolutely complete consensus behind it as to need.

The West Chamberlain Creek Road (200) Should Not be Abandoned

Having stated the above, I was nevertheless surprised and concerned to see the following on Page VII.15-7:

"Wide-scale road decommissioning will not be conducted in areas with no alternative access. However, selective decommissioning of high-risk road segments in these areas may occur. "Road 200, for example, is a potential candidate for road abandonment due to its "somewhat hazardous and potentially damaging inner gorge location" (DFMP, Page 87). This road is currently used as the primarily route for logging trucks that haul out of the Noyo River drainage and by recreational vehicles that visit the San Francisco Boys and Girls Club and Camp Noyo Boy Scouts Camp. In order to facilitate potential decommissioning of Road 200, the Forest may examine the potential to acquire alternative public access along the Three Chop Ridge Road (also known as CDF road 1000) between the eastern Forest boundary and Highway 20, and incorporating the Three Chop Ridge Road into the Forest's road system. (See Map Figure A in the attached Map Figures section).

"Three Chop Ridge would provide a safer route of travel to the intersection of State Highway 20 for both commercial and recreational vehicle traffic. Incorporating Three Chop Ridge Road into JDSF would also provide the State with control of a major fire suppression ridge, which would benefit adjacent landowners as well."

I am willing to be convinced otherwise, but I believe many would strongly object to decommissioning Road 200. This is the primary access to the Waterfall Grove, which is generally considered to be the highest use feature on the forest. However, I do completely support the idea of securing the alternative access to Three Chop Ridge Road and using that for all logging and as much of the Boy Scout Camp traffic as feasible. If Road 200 were to be closed completely and traffic diverted to Three Chop Ridge (Road 1000), it would add many, many miles onto the trip to the Waterfall Grove from Ft. Bragg/Mendocino. And if staff at the Boy Scout Camp wanted to go to Ft. Bragg rather than Willits, it would also add many miles onto their trip. While Road 200 does have continuous maintenance needs, I am not under the impression it produces much sediment into the creek. Perhaps paving or chip seal might be an adequate mitigation short of decommissioning. Please consider this alternative.

Thank you for consideration of these additional comments.

Best regards,
Kathy Bailey
Kathy Bailey
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California Sierra Club