



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

January 8, 2007

Ruben Grijalva, Director
California Department of Forestry
Stan Dixon, Chair
Board of Forestry
1416 9th Street
PO Box 944246
Sacramento, CA 94244-2460
Fax: (916) 653-4171

Dear Ruben and Stan:

I am writing this letter on behalf of the Campaign to Restore Jackson State Redwood Forest. I do not speak for any other members of the Mendocino working group.

Ruben, I thank you for your efforts during the January 4, 2007 meeting to gain agreement from your staff and the Board of Forestry members on a slow approach to developing a new management plan for Jackson Forest. I could not agree more with you that the key element of success will be the building of mutual trust among all parties. Going slowly and engaging the public in decisionmaking are essential to developing the necessary trust.

Several issues remain that need to be resolved in order for me and my supporters to feel comfortable with the proposed management plan.

The Mendocino working group came together at my initiative. All members understood that we were working to reach consensus in order to eliminate all roadblocks to resuming operation at Jackson Forest. I am delighted by the success of our group in reaching a consensus. I only accepted conditions and principles with which I was willing to live and to sell to my supporters. In a number of instances, I was pushed to the edge of acceptance by others in the group, but I stand behind all of the recommendations of the group.

Conforming the Draft Plan to the Group's Recommendations

The principles and proposals of the working group provide *the* blueprint and roadmap for successfully resuming operations in Jackson Forest. If the department and the Board adopt the key elements of the group's report, all parties can move forward cooperatively.

I have reviewed the features of the draft management plan as summarized in the executive summary and comparison chart of the group's proposals and Alternative G prepared by Russ Henly. I provided comments on key points via an attachment to an email sent on January 5, 2007.¹ I identified important disagreements between the working group and the CDF draft plan. Kathy Bailey also pointed out significant, important discrepancies between the two.²

Here, I want to be completely frank with you on what needs to occur to allow me to cooperate fully in getting Jackson Forest back in operation. **The draft management plan needs to be made to conform to the key elements of the Mendocino group's**

report. This should not be difficult. There are only a few areas where substantial changes are required. The Mendocino group's recommendations were approved by three of the major Mendocino County timber firms, as well as representatives of the Sierra Club and the Campaign. They represent reasonable positions that should satisfy the needs of all concerned.

Below I discuss issues that are particularly important to me. I also support making changes to accommodate the discrepancies between the draft plan and the group's recommendations identified by Kathy Bailey.

Agreement on Initial Phase: The meeting on January 4, 2007 appears to have resolved one of the outstanding issues – the need to have an initial phase of operation during which timber harvesting will avoid precluding options that might be pursued later and during which a long-term landscape and management plan will be refined and finalized with the participation of advisory groups and the public.

Desired Resolution: My understanding is that there was agreement to proceed with the initial phase in a way that accommodates the intent of the "two-phase" proposal of the Mendocino group. Please correct me if I am wrong.

I will provide Russ Henly additional details on the areas that should be identified in the initial phase as having potential important long-term values.

Restriction of Even-Age Management to Research: What was not resolved, but needs to be, is the draft plan's proposal for significant use of even-age and group selection silvicultures, independently of approved research protocols. Silvicultures that remove a high proportion of the overstory canopy have a heavy impact on the ecological, biological processes in the stand. Key to gaining consensus within the working group was agreement to emphasize selection harvesting and to strongly restrict even-age and group selection harvesting:

All timber harvest activities on JDSF should preserve or improve the long term forest health. Selection silviculture should be maximized. Even aged management should only be allowed for well justified research projects and as necessary to promote stand health. The size and scope of these projects should be no larger than the minimum needed for scientific validity. Group selection plots will be the minimum size consistent with wildlife concerns and obtaining regeneration, they will only be used when justified as the most ecologically beneficial way to obtain needed regeneration and or habitat. Variable retention should be used sparingly. When used it should be associated with research, stand health, wildlife concerns, and have higher than average retention levels. None of the above should be construed to prohibit the entire spectrum of harvesting intensity and or frequency as long as it is tied to research.

The draft plan proposes even-age silviculture on 9,345 acres and potentially group selection on 7,325 acres. Neither of these acreages are part of "justified research projects," nor could they realistically so be justified, given the constraint that "these projects should be no larger than the minimum needed for scientific validity."

Desired Resolution: The draft plan should be modified to eliminate the planned acreages of even-age and group-selection acreages. Even-age and group-selection silviculture should be restricted to justified research and ecological needs as specified by the working group.

Advisory Group Relation to the Board of Forestry: The working group proposed the creation of a Jackson Forest advisory committee appointed by and reporting to the

Board of Forestry. The draft plan proposes that the advisory committee be appointed by and report to the director of CDF. An advisory committee that has independence from CDF is an important safeguard that Jackson Forest will be managed for the public benefit, not simply for the benefit of CDF. We have experienced the fate of the work of the Citizens' Advisory Committee of the 1990s. We need to have assurance that this will not be repeated. Although I have complete faith in the sincerity and intentions of the present director, no one can give assurances about future directors.

Desired Resolution: The proposal of the Mendocino group should be adopted by CDF and the Board.

Enjoined Timber Harvest Plans: The Mendocino group proposal specified that harvesting of the enjoined THPs, Brandon Gulch and Camp 3, would occur, if at all, after the initial phase of operations was complete. I recognize that there are constraints that affect CDF's freedom of action on satisfying the bid winners and meeting the recommendation of the Mendocino group. Despite these difficulties, this issue needs to be addressed and resolved.

Desired Resolution: At the least, no harvesting should occur in the enjoined THP sites until after the initial phase of the new management plan. More desirable would be reaching an agreement with the winning bidders on substituting timber from less sensitive areas.

Woodlands Transfer: The Woodlands Transfer from the federal government to CDF in 1947 totals 5,426 acres, only 780 acres of which has been transferred to Parks. The remaining ~4700 acres is almost 10% of Jackson Forest. 2,550 acres of this is in a "Special Treatment Area", with CDF pledging special treatment, but over 2,000 acres is not.

The transfer deed from the U.S. to California states, "... the grantee .. shall use the property exclusively for public park, recreational, and conservation purposes..." Some of the transfer has been logged in the past, and a part of it is proposed for a demonstration area in the draft plan. Such use appears on its face inconsistent with the legal restrictions in the deed transfer.

I brought this up with working group, and there was general agreement that the legal issues related to the Woodlands Transfer needed to be resolved. However, in hurrying to complete the group's report, no recommendation was included. It, however, remains an important concern to me.

Desired Resolution: No harvesting should occur within any part of the Woodlands Transfer acreage during the initial phase. During this phase, the legal status of the property should be independently reviewed and the ongoing controversy resolved.

Biological and Wildlife Inventories: The working group recommended that "minimum data collection needs at JDSF... [include a] forest wide wildlife and botanicals inventory, and monitoring program." As a premier research and demonstration forest, Jackson Forest must have this ongoing, comprehensive biological information. The draft plan proposes only surveys "within project areas."

Desired Resolution: The management plan should incorporate a commitment to implement a forest wide wildlife and botanicals inventory, and monitoring program.

Wildlife Habitat, Old Growth, and Recreation: I refer you to Kathy Bailey's identification of areas where the draft management plan departs significantly from the group's recommendations.³

Desired Outcome: Revise the draft plan in each of these areas to conform to the intent of the Mendocino group's recommendations.

In Conclusion

I will be out of the country from January 15 through February 5. These issues are sufficiently complex that they are not going to be decided prior to my departure.

I suggest that we agree to a deadline for resolving the management plan changes sufficiently prior to the March meeting of the Board of Forestry so that agreed changes in the plan can be presented to the Board at its March meeting. I wish this could happen more quickly.

Please call me to discuss my proposals at your earliest convenience.

Sincerely,



Vince Taylor
Executive Director

¹ Email from Vince Taylor to George Gentry, "Comments on the JDSF executive summary," January 5, 2007, with attached file: "01.03.07 Executive Summary Working Draft-VT1.doc"

² Email from Kathy Bailey to George Gentry, et. al., " Quick look at Mendo Group compared to Alt 8," with attached file: "Principle v Alt 8 Proposals.doc".

³ Ibid.