

June 20, 2007

Board of Forestry and Fire Protection  
PO Box 944246  
Sacramento, Ca. 94244-2460  
Attention: George Gentry, Executive Director

Re: Jackson Demonstration State Forest Management Plan (Alternative G)

Dear Members of the Board,

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

Bruce Burton

Kathy Bailey

Art Harwood

Vince Taylor

Mike Jani

Mike Anderson