

Mendocino County BOS Meeting 11/15/21 Public Comment Agenda Item #4A

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**Dear Mendocino County Board of Supervisors,**

I wish to commend you all for your foresight in addressing the issues at Jackson Demonstration State Forest. I regularly take walks in the western area of JDSF. These trails around the Caspar area are easily accessible and abound with so many species of flora and fauna that have repopulated within these recovering second growth forests.

Research, Demonstration and Recreation are the three main operating elements of JDSF (see their website!). I see so many people and classes use JDSF to get away into or study nature.

The big question that I have is, why are the several THPs (Timber Harvest Plans) in JDSF defended? These operations are conducted by merchantable timber logging companies that hire staff that are not trained in forest restoration or recreation trail restoration? The timber logging companies prefers larger trees and mixing commercial logging operations in a Research, Demonstration and Recreation forest makes no sense.

New research from studies already conducted around the world shows that trees are consuming more carbon dioxide than previously reported, making forests even more important in regulating the Earth's atmosphere and forever shift how we think about climate change.

Half measures will not help and again logging contractors are not botanists, nor trail or restoration specialists. This is not about the old divisive blaming of environmentalists versus loggers rhetoric that is recklessly tossed around.

The cry is for ensuring the resiliency of JDSF's forests, watersheds and ecosystems. Indigenous tribes as central partners and their knowledge of managing resources must be brought to the table in this shaping how we will manage what is left of our second growth forests.

Ninety-seven percent of the fires in Mendocino County were started by human behavior not natural wildfire.

JDSF lands are particularly well situated to help California implement Governor Newsom's (Oct 07, 2020) [EXECUTIVE ORDER N-82-20](#) . Harnessing the innovative spirit of California, Governor Gavin Newsom advanced an executive order enlisting California's vast network of natural and working lands – forests, rangelands, farms, wetlands, coast, deserts and urban greenspaces – in the fight against climate change.

Please take the time to read and access the information below that I have compiled for you all

## **New Studies and Demonstrations already exist.**

We do not need to wait for novel studies. Multitudes of studies already exists. The scientific community agrees that present approaches to logging forests contributes to climate change because it depletes the forests' ability to absorb vast amounts of the warming gas CO<sub>2</sub>. **Restoring forest landscapes helps enhance climate change mitigation and adaptation.**

### **See more at:**

- Biologists uncover forests' unexpected role in climate change (2021)  
<https://www.sciencedaily.com/releases/2021/02/210208185117.htm>
- Background Analytical Study Forests and Climate Change- Background study prepared for the fourteenth session of the United Nations Forum on Forests (2019)  
<https://www.un.org/esa/forests/wp-content/uploads/2019/03/UNFF14-BkgdStudy-SDG13-March2019.pdf>,
- Stabilizing our climate by protecting and restoring nature  
*"To avoid the catastrophic consequences of climate breakdown, there are certain places we simply cannot afford to destroy."*  
<https://www.conservation.org/priorities/stabilizing-our-climate-by-protecting-and-restoring-nature>
- **IUCN**, International Union for Conservation of Nature:  
Forests and climate change <https://www.iucn.org/resources/issues-briefs/forests-and-climate-change>  
**IUCN** is a membership Union composed of both government and civil society organizations. It harnesses the experience, resources and reach of its more than 1,400 Member organizations and the input of more than [18,000 experts](#). This diversity and vast expertise makes IUCN the global authority on the status of the natural world and the measures needed to safeguard it.)
- **Scientific American: *Better Logging Could Slow Global Warming***  
<https://www.scientificamerican.com/article/better-logging-could-slow-global-warming/>

## Whose Interests Control the fate of Jackson Demonstration State Forest?

The entrenched principle of responsible control of forests has become an unnecessary battle of new science research against the stream of merchantable timber interests: brokers, timber company owners, exporters, etc. all who seek quick profits.

The timber industry prefers larger trees, but smaller trees and debris must be cleared out as well, and there is little market for that material. If it is burned as “biomass” rather than repurposed, that could trigger an environmental battle over the resulting air pollution.

Under existing timber harvest regulations, fuel loads are typically left on the ground--created by non-marketable parts of the trees or are dead due to the use of herbicides.

Additional wind corridors are created and additional wind, speed of wind dries out the soil and fans the forest fire making it spread faster, burn hotter and higher. Canopy loss leads to increased ambient and direct sunlight drying out the forest floor and changes the ecology of the forest ecosystem. Beneficial microbes in the soil are impacted.

## Where is the Cost Benefit Analysis of Forest Services?

At a regional and local levels, forests provide many services. They preserve soils that help prevent flooding, they provide habitat that support biodiversity, they help filter pollutants from the air that can affect human health. Forests help **control the water cycle by regulating precipitation, evaporation and flows**. Layers of forest canopy, branches and roots can store and release water vapor, which controls rainfall. Forests also help reduce the impacts of flood from storms by blocking and slowing down the flow of runoff.

“Today, **recreation in forests** assumes ever-growing importance with the growth of cities whose inhabitants need a change of scene, fresh air, and freedom to wander, as a relief to the stresses of industrial and commercial life. Forests and their associated soils and litter layers are excellent filters as well as sponges, and water that passes through this system is relatively pure. Forest disturbances of various kinds can speed up the movement of water from the system and, in effect, reduce the filtering action.”( Edlin, Herbert Leeson , Chaney, William R. and Pope, Phillip E. "forestry". Encyclopedia Britannica, Invalid Date, <https://www.britannica.com/science/forestry>. Accessed 9 November 2021. <https://www.britannica.com/science/forestry>)

## Tired trope of “sustainable logging operations”

We already know the problems that exist. Thousands of Timber Harvest Plans (THPs) public comments have cited problems and adverse impacts by logging companies including their refusing to assess the cumulative impacts upon the health of a forest ecosystem. Academics and scientists have already pointed out the problems of industrial

forest practices. Studies and THP's treat the forests as individual parcels and not as whole living ecosystems and this tired trope of "sustainable logging operations" does not acknowledge or even look at quantifying the ecosystem services that forests provide.

Logging as practiced is nothing more than tree plantation management.

"The regular harvesting and clearing of plantations releases stored CO<sub>2</sub> back into the atmosphere every 10 to 20 years. By contrast, natural forests continue to sequester carbon for many decades." "In theory, reforestation in many places could be achieved through natural regeneration, where land is left to return to forest with minimal human intervention.

The safest way to do it is to find places that will recover naturally and areas that are already near other areas of forests, areas that have just very recently been cut down....Because you would expect that there would still be some seedstock in the soil and the birds and wildlife will be dispersing seeds.""-

(Source: <https://www.wired.com/story/we-might-not-be-planting-the-right-kinds-of-forests/>)

## Who will monitor whom?

The JDSF operates under the California State Board of Forestry. The California State Board of regulates commercial timber production to protect industry's market-based logging practices rather than the ecological health of forests. The California Board of Forestry, stacked with timber industry interests govern the California Timber Harvest Rules and Board of Forestry and their regulations are outdated in their response to the unprecedented and historic impacts of climate change and how forests have enormous potential in mitigating climate change. Enforcement of the regulations really does not exist since current forestry practices are under the guidance of the corporate timber industry and no based on current science and that reduces the ability to practice good forestry.

We would like to think that sustainable logging, is not about clearcutting. Unfortunately, certain types of clearcutting are employed —" **allowable cut**, " **even-aged management**," " **shelterwood harvest**," " **sustained yield**," " **variable retention**," and " **restoration**" are often allowed under sustainable forestry practices.

Note that logging terminology can be manipulated and is often not understood by the public or policymakers. Confusion between these different uses of terms is more common than not. In addition, many variations of terminology mean that technically correct usage may not be descriptive enough to know what is meant in each case.

Logging forests as practiced under JDSF/California Board of Forestry is not a climate change solution.

## **Environmental justice and First Nations**

Logging which impacts climate change, also leads to deforestation or degraded forests negatively affects the health of people which in turn creates issues of Environmental Justice. **California was one of the first states in the nation to codify environmental justice in a statute.** Does JDSF include provisions to address individuals who are disproportionately impacted by public health hazards as in climate change? How about access to the healing aspects of recreation in nature

Where is the demonstration and research attributed to Native People First Nations? Women, children and minorities are often left out of consideration in these decision-making processes? Will these individuals be included in the decision-making processes?

That includes future generations!