

My name is Evan Mills. I live in the town of Mendocino and am a frequent recreational user of Jackson Demonstration State Forest. I'm also a retired Senior Scientist with Lawrence Berkeley National Laboratory, and have published on wildfire dynamics and other aspects of climate change impacts. I have been an active past contributor to the scientific work of the United Nations' Intergovernmental Panel on Climate Change (IPCC). In the following article, a colleague and I outline substantial concerns with Cal Fire's modus operandi regarding JDSF and beyond:

I deeply appreciate the BOS taking up this issue, which impacts so many county residents and visitors. I only regret that the latest round of logging began prior to this deliberation. **I support the resolution described in Agenda Item 4a for the BOS meeting of November 15, 2021, with the additional suggestion that the study be completed and its recommendations implemented before logging continues.** This approach would also incentivize Cal Fire to cooperate with the study authors, and would minimize regret if findings confirm that current practices are inconsistent with the State's broader climate and wildfire safety objectives.

Otherwise, the major planned timber harvests (~5000 acres, *or 10% of all JDSF land area*) will be largely if not fully completed before the proposed study is published. This is undesirable in light of the draft Resolution's important point that JDSF is operating with "goals not yet refreshed to reflect the State's recent climate commitments and has commenced logging." However, the "Be it Resolved..." statements don't address this (and, by extension, they sidestep related public concerns). Even if not the BOS' intention, some will construe this as implicitly blessing the continuation of business-as-usual logging, enabling the locking-in of adverse climate/wildfire impacts that could have otherwise been avoided through a more rational, deliberative process based on the latest science.

I would also encourage the BOS to insist that the study be performed by entities fully independent of Cal Fire and JDSF. The document should be peer-reviewed and those comments and authors' responses to those comments posted in the public domain. This is how the IPCC process is managed, and it ensures transparency. For the report to have any chance of being credible, Cal Fire should also not be the entity to select reviewers or manage the review process.

I also encourage The Board of Supervisors to go beyond simply recommending a study, which is likely too little, and too late. While I am a big proponent of studies, and have authored scores of my own, it is not clear if and how another study will help improve Cal Fire's management practices. Indeed, in this context, another study may merely give cover to existing bad practices while delaying appropriate changes. Meanwhile, there is already a very extensive existing peer-reviewed literature that indicates that many existing policies and practices held by Cal Fire are antiquated and will reduce carbon storage in JDSF, increase fire risk, and further degrade the ecosystem. If properly considered, the existing literature could suffice for making policy changes.

Moreover, Cal Fire has repeatedly demonstrated a bold willingness to simply ignore studies. This behavior must also be addressed. In my experience, Cal Fire's actions routinely run counter even to its own verbal and written statements, guidelines and principles laid out in its planning

documents and THPs, and the prevailing science more broadly. Their written responses to science-based questions from myself and exports regarding forest management over the past year have been vague, evasive, and reflect cherry picking of the literature to justify existing practices. The underlying issues are addressed Wilson and Duggan's piece entitled "Why it is time for a 'CalFire Divorce': The case for establishing an independent forest and resource management agency to secure healthy forests in California" (Golden Gate University Environmental Law Journal), which lays out Cal Fire's apparent disregard of the Forest Practice Act, conflicts of interest, etc.

Thank You,
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