

Board of Supervisors,

I am writing to express my strong opposition to Item 4(a) Resolution Requesting Scientific Review of Jackson Demonstration State Forest.

My objection is based largely on concerns about the unattended consequences of this agenda item. The creation of this “review” will have the potential of being misconstrued as supplanting the already approved JDSF Management Plan, the Environmental Impact Report, and individual Timber Harvest Plan Documents that have already undergone rigorous science-based review to ensure compliance with the California Environmental Quality Act (CEQA). It is irresponsible for the Board of Supervisors to go about proposing, much less approving, an Item without considering the potential fallout such a proposal would have on our State Lands and the CEQA process in general.

I am deeply concerned with the language used in the Resolution. The Resolution contains loaded terms, such as deforestation, to inappropriately describe the management of JDSF. The management conducted on JDSF ensures that what was once forested will continue to exist as forest; as such deforestation is entirely irrelevant to the matter at hand. At best, the Board's decision to use this term shows a distinct lack of knowledge about what JDSF's forest management is and is not; at worst, it shows a clear bias and attempt to negatively portray JDSF. This misunderstanding could easily have been avoided if the Board had requested a meeting with California Department of Forestry and Fire Protection staff prior to moving forward with this proposal, this simple action would at least ensure the Resolution is based in reality.

In conclusion, esteemed environmental attorney Sharon Duggan and former CALFIRE Director Richard Wilson had the following to say *“Jackson provides a working landscape for jobs and sustainability over time by restoring and maintaining all forest resources and community life. Jackson protects the State's interest by providing a healthy forest ecosystem, which sustainably provides high quality wood product. As a healthy forest, Jackson also supports healthy populations of animal and plant species and can be essential to prevent extinction of endangered and threatened species, such as our salmonid fish. Moreover, this healthy forest has an increased ability to sequester carbon and remove carbon dioxide from the atmosphere. The Forest Practice Act requires that not only must the public's need for carbon sequestration be protected in any given logging plan, but also, because “[t]here is increasing evidence that climate change has and will continue to stress forest ecosystems,” California forests must be proactively managed to sequester carbon and adapt to the stressors of the climate crisis”* (Wilson, 2020). Having worked as an independent contractor who conducted forest measurement work on JDSF in the past, which necessitates measuring thousands of JDSF's trees, I strongly agree with the conclusions drawn by the authors cited above. The State Forest has the data to back that up; I'm sure they would be willing to share that data if the Board asks.

Respectfully,

Mark Pugsley,

Fort Bragg, CA