

Kathy Bailey

November 14, 2021

Dan Gjerde, Chair
Members of the Board
Mendocino County Board of Supervisors
501 Low Gap Road
Ukiah, CA 95482

Background in Support of Mendocino Co. Board of Supervisors Resolution re JDSF

Dear Chair Gjerde and Members of the Board:

Thank you for proposing a Board Resolution requesting Scientific Review of Jackson Demonstration State Forest. **I strongly support the Board bringing these issues to the attention of the Governor and the Secretary for Resources.** I am providing, below, some additional information that is relevant to your Resolution. I comment as someone who is quite familiar with JDSF and its administrative history. I was among those appointed to the Jackson Advisory Group (JAG), which spent more than three years reviewing the operations at JDSF and which issued comprehensive consensus recommendations to the California Board of Forestry in 2011, a significant portion of which the Board of Forestry chose to reject. Prior to that, in 2007-8, I sat on the Demonstration State Forest Advisory Group (DSFAG) which was charged with oversight of all of the state's Demonstration Forests. I was Vice-Chair of the DSFAG in 2007.

One possible way forward would be to temporarily halt all logging operations and THP approval and bring the Management Plan into compliance with the requirement that it be up-to-date, with a particular focus on it being consistent with state policy regarding Climate Change and allocation of state lands to mitigate Climate Change. This would include updating the EIR and the Research Plan. These documents need to acknowledge the reality of global Climate Change, that old growth redwoods and other older redwood forest stands are well documented to sequester substantial amounts of carbon, and to consider how JDSF can use its already-authorized demonstration function to manage JDSF for maximum carbon sequestration and implementation of state goals. This should be done in conjunction with demonstrating how JDSF can provide positive visitor experiences, thereby contributing to an increasingly important sector of the Mendocino County economy.

The Management Plan is Out of Date

The Forest Management Plan (FMP) relied on to approve or consider current and pending THPs is out of date because it does not give adequate consideration to the role JDSF and its older forest stands could play in helping sequester carbon and mitigate Climate Change.

Most consideration of Climate Change is in Appendix X of the 2016 update to the 2012 FMP. This Appendix, which consists of the 2014 Research Plan (RP), only considers research and demonstration to document the *effects* of Climate Change. ***There is no consideration of actually providing mitigation for Climate Change*** by managing for retention and development of older forest stands.

The Environmental Impact Report (EIR) the FMP Relies on is Out of Date

The EIR that the Management Plan relies on is from 2008 as amended in 2011 and gives no consideration whatsoever to using JDSF to mitigate Climate Change.

Board of Forestry Policy Requires Regular Management Plan Updates

Board of Forestry (BOF) policy requires Management Plan updates *at least every five years*. Even under ordinary circumstances, which these are not, the Management Plan is due for an update. However, the Board of Forestry has shown itself to be highly resistant to realigning its priorities to seriously take into consideration the concerns of the non-regulated public, including Climate Change and allocating JDSF toward providing mitigation for Climate Change. Thus, it is imperative that the Governor and Resources Agency assert their authority to make sure that any revised Management Plan is consistent with current state policy regarding Climate Change and protecting 30% of California's land and water by 2030. ***The BOS Resolution correctly addresses your concerns to the Governor and the Resources Agency.***

The 2014 Research Plan is Out of Date and Relies on Older Studies

The References for the 2014 Research Plan begins on Page 325 of the 2016 update to the FMP, with the Focus Area 4 references beginning on Page 333. It is notable that ***of the 19 papers cited in the References list, the most recent are five that date from 2011-2014; nine are dated between 2000-2010; and four are dated pre-2000. As the Research Plan itself dates from 2014, by definition it has considered nothing more recent.***

As good as the Research Plan was in 2014, it needs updating to reflect both current research and demonstration priorities to support state policy goals and the current state of knowledge about Climate Change and Carbon Sequestration. ***It needs to consider research and demonstration projects that can be implemented in conjunction with the Climate Change mitigation of maintaining and increasing the inventory of large, old trees at JDSF.***

Use the High Values for Desired Future Forest Structure Conditions

On an interim, immediate basis, JDSF could commit to using the larger of the values in FMP Table 7, Desired Future Forest Structure Conditions, which ***have already been approved.***

Under the low values, Late Seral or Old Growth; Older forest structure; and Mature and Large trees would be 30% of the forest, or 14,596 acres. Under the high values for

those structures, they would be *60% of the forest, or 29,191 acres*. By simply declaring an immediate commitment to maintaining the higher value, a significant step toward addressing public and state goals could be taken.

Table 7. Desired Future Forest Structure Conditions.

Forest Structure Condition	Percent of Forest Acres
Late seral or old-growth	15-25
Older forest structure	10-20
Mature and large trees	5-15
Mixed age and size	30-40
Regeneration and pole-size younger trees	10-20
No specific structure assigned	0-10

Window of Opportunity

We have a brief window of opportunity to contribute to mitigating the effects of the global Climate Emergency. We can, and must maintain the existing inventory of large, old trees and allow more trees to continue to grow. Accepting this challenge is ***well within the research and demonstration function of JDSF***.

Very Little Public Forest in the Redwood Region

One of the realities CDF and the Resources Agency would do well to face is in graphic form as Map Figure 2 in the FMP, which clearly shows the dearth of public lands in the redwood region. Compared to lands east of Highway 101, which are drier and hotter than the redwood coast region, we have no National Forest, and ***the overwhelming majority of the Coast Redwood ecosystem is marked in purple, Private Forestland. Industrial timber management on this private forestland has reduced the inventory of large old trees to essentially zero there. This reality amplifies the importance of the older forest resources at JDSF.***

Our region has a vibrant and much publicized visitor-based economy. CDF, the Governor, and the Resources Agency now have the opportunity to come to grips with this reality and craft a management plan that not only sequesters a significant and increasing amount of carbon in its big, old trees at JDSF, but demonstrates how to do so in a way that provides the hike and bike trails and other forest experiences that the non-regulated public wants to have, thereby also making a significant contribution to the local economy.

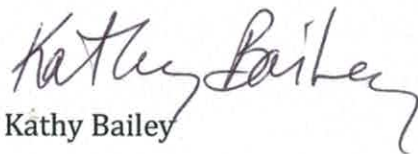
The Immediate Future and the Next 40 Years

The 2011 Jackson Advisory Group (JAG) Report states in Chapter 1, Page 3, that among the Agreements that led to developing consensus was ***“Adoption of a 40-year term for JAG recommendations that, in effect, defers the decision on allowing trees to grow old to a later generation of managers and stakeholders.”*** This was in relation to a proposal to

always keep some trees in every timber harvest block that would be allowed to grow old (*a recommendation the Board of Forestry threw out*). By adopting the 40-year time frame, the decision on what to do with retained trees would be deferred. **Using a similar limited time frame, one approach to the current situation would be to allow all big, old trees to continue to grow for the next 40 years. What to do with them in the future can be decided then, when we either have a livable planet or we do not.**

Thank you for your Resolution, which will bring these issues to the attention of the Governor and the Resources Agency.

Best regards,

A handwritten signature in cursive script that reads "Kathy Bailey". The signature is written in dark ink and is positioned above the printed name "Kathy Bailey".

Attached: FMP Map Figure 2. Regional Forestland Ownership

Map Figure 2
Regional Forestland Ownership
Northern California

