



December 15, 2021

Julia Rhoads  
802 N MAIN STREET  
FORT BRAGG, CA, 95437  
RPF 002815

Re: Red Tail THP 1-19-00224-MEN Violates JDSF Option A

Dear Ms. Rhoads,

On behalf of the Coyote Valley Band of Pomo Indians, Environmental Protection Information Center, Redwood Coast Watersheds Alliance, Standing up for Racial Justice Mendo Coast, Jug Handle Creek Farm & Nature Center, Northern California Unitarian Universalists Camps and Conferences, Mendocino Trail Stewards, and We Speak for the Trees of Jackson State Forest, we write to urge you to immediately halt logging on the Red Tail THP 1-19-00224-MEN located in Jackson Demonstration State Forest. The Red Tail THP is located in an area of Jackson Demonstration State Forest which is allocated as an Older Forest Development Area (OFDA).<sup>1</sup> The OFDA is part of the Older Forest Structure Zone which the JDSF Management Plan defines as follows:

*"A contiguous 6,803-acre corridor will be managed as an Older Forest Structure Zone, extending across JDSF from west to east and north to south (JDSF Management Plan, Updated 2016, Map Figure 5), composed primarily of reserved Old-growth Groves, Late Seral Development Areas, and older forest development areas. This area will produce structural characteristics of older forest, which include large trees, snags, down logs, multiple canopy layers, and a high level of structural diversity. The portions of this zone available for timber management would be managed on an uneven-aged basis to recruit these structural conditions and wildlife habitat elements, to coincidentally grow and produce timber through careful thinnings and periodic replacement of large trees, and to provide recreational opportunities. The Older Forest Structure Zone will have high value for research concerning topics such as restoration of older forests and the ecological processes associated with older forests. It also will improve the long-term*

<sup>1</sup> Red Tail THP, Sec 3, p. 109

conditions for wildlife, particularly species that prefer older forests. It provides a continuous corridor of forest that links most of the Forest's old-growth groves, and also provides habitat linking adjacent industrial timberland with the forests of JDSF".<sup>2</sup>

The JDSF Option A delineates clear silvicultural prescriptions for each forest management type. Under OFDA, the JDSF Option A states "[h]arvest as a max % of preharvest basal area" [shall be] "None/25,30,35% max."<sup>3</sup> In other words, at most THPs should only be harvesting 35% of basal area [BA] in an area marked OFDA. This makes sense because an area designated for OFDA should retain a considerable amount of basal area postharvest in order for the forest to be allowed to successfully mature.

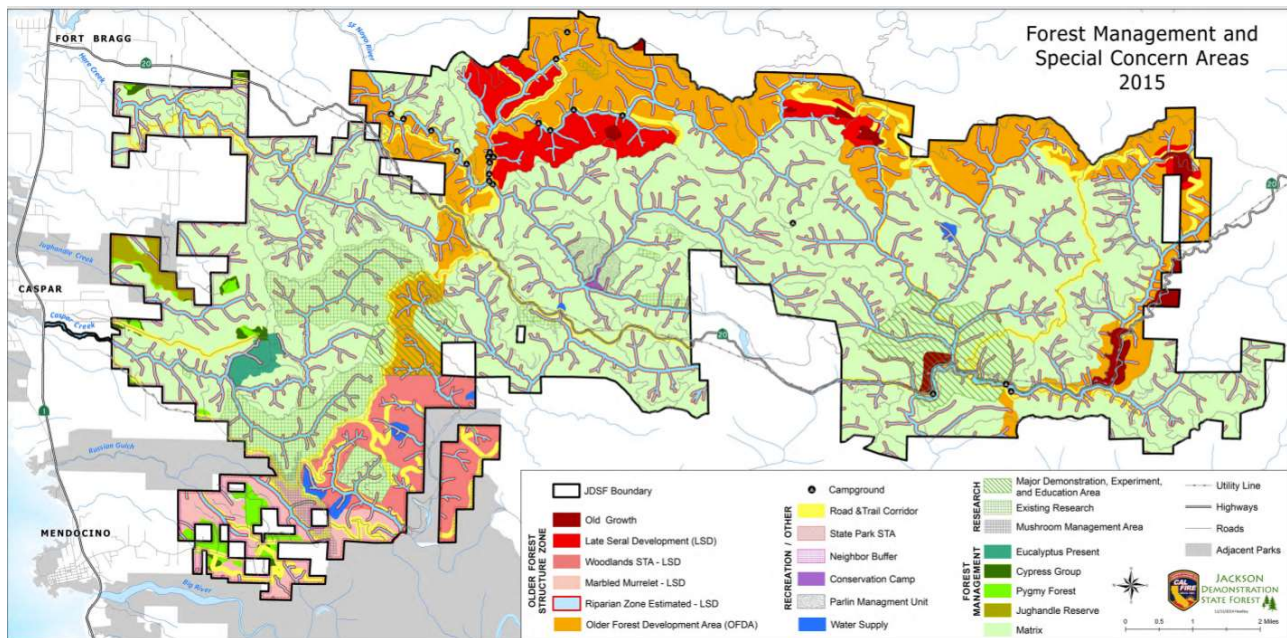


Figure 1 Forest Management and Special Concern Areas 2016 JDSF Management Plan Update

Despite this, the Red Tail THP silvicultural prescription intends to harvest far more than that. In the western units the preharvest BA is 277 ft<sup>2</sup> per acre and the objective postharvest BA is 150 ft<sup>2</sup> per acre.<sup>4</sup> That means 45.85% of the basal area is being removed.<sup>5</sup> In the eastern selection units the preharvest BA is 393 ft<sup>2</sup> per acre and the objective postharvest BA is 190 ft<sup>2</sup> per acre.<sup>6</sup> That means 51.17% of the BA is being removed. Finally, in the eastern group selection units the preharvest BA is 286 ft<sup>2</sup> per acre and the post-harvest BA is 160 ft<sup>2</sup> per acre.<sup>7</sup> That means 44.01% of the BA is being removed.

<sup>2</sup> JDSF Management Plan, 2016 Update, page 70

<sup>3</sup> JDSF Option A, Appendix 1, Page 40,

<sup>4</sup> Red Tail THP, Sec 3, p. 109

<sup>5</sup> Red Tail THP, Sec 3, p. 109

<sup>6</sup> Red Tail THP, Sec 3, p. 109

<sup>7</sup> Red Tail THP, Sec 3, p. 109



*Figure 2 Tree harvested in Red Tail THP*

The THP fails to explain why the RPF chose to exceed the maximum BA removal modeled in the JDSF Option A for the OFDA. Without an explanation, it appears that the RPF chose to exceed the limit in order to remove more timber, and thus more profit, from the forest. Given that Red Tail is located in one of the few areas of JDSF that is at least theoretically meant to develop into an older forest, it is deeply disappointing to see that CAL FIRE is writing and approving THPs that do not conform with their own Option A and management goals. We ask that you halt activities in the Red Tail THP immediately and provide an explanation as to why harvesting such a large percentage of the basal area, including mature second growth trees, in an area designated for OFDA complies with JDSF management objectives.

Sincerely,

Linda Perkins for Redwood Coast Watershed Alliance

Matt Simmons for Environmental Protection Information Center

CC: Thomas Porter, Director, CAL FIRE  
Kevin Conway, Acting Forest Manager, CAL FIRE  
Jason Liles for Senator Mike McGuire  
Ruth Valenzuela for Assemblymember Jim Wood  
Santa Rosa CAL FIRE Public Comment  
Board of Forestry  
Resources Secretary Crowfoot  
Deputy Secretary Jessica Morse