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January 28, 2006

Mr. George D. Gentry  
Executive Officer  
Board of Forestry and Fire Protection  
PO Box 944246  
Sacramento, CA 94244-2460

**Reference: Comments on Jackson Demonstration State Forest DEIR**

Dear Mr. Gentry,

CLFA has reviewed the Draft Environmental Impact Report (DEIR) for Jackson Demonstration State Forest (JDSF). We are submitting these written comments to be considered by the Board as it moves toward a final EIR.

CLFA supports the just restoration of forest management at JDSF, including the critical components of research and demonstration. Courts can rule for and against on issues of law, but they are not capable of assuming day-to-day responsibility for the burdens and complexities of forest land management. Stewardship, if it is to exist, rests with on-the-ground professional resource managers executing decisions based upon sound planning and clear management direction.

**We believe that the preferred Alternative C1 represents a quantum leap in both management sophistication and environmental protection as compared to its 1983 predecessor.** We support C1 because we believe that it is a skilled compromise on contentious environmental issues, while remaining responsive to legislative intent for JDSF to be a working, *demonstration* state forest.

**World Turning**

In the 5 years since the management program at JDSF was first halted by legal action, factors undermining the competitiveness and sustainability of California forestry have continued to intensify. These include increased costs for state regulatory permits, continued mill closings and employment losses in the forestry sector, and accelerating pressure on private timberlands to be converted to non-forestry uses.

Since 2001, forest management in both California and the United States has faced new structural challenges. One trend is for forest products companies to divest themselves of their holdings. An article in the *Journal of Forestry* (12/04<sup>1</sup>) stated, “Most forest products companies now have real estate development divisions and are actively marketing properties.” Although the article documents the situation in the US South, the

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<sup>1</sup> “The Speculative Shadow Over Timberland Values in the US South.” Wear, David N. and Newman, David H., *Journal of Forestry*, December 2004.

trend is nationwide. Values for undeveloped forestland have rapidly appreciated. The price increases have not been driven by traditional timber considerations but by competing land uses such as subdivision and development.

Indeed, the focus of many environmentalists has shifted in recognition of the emerging threat to open space and sustainable forestry. In May 2005, the *California Forest Futures*<sup>2</sup> conference in Sacramento brought together diverse stakeholders to discuss the situation in the Golden State. One impetus for the meeting may have been CLFA's *California Forestry 2050*<sup>3</sup> white paper.

CLFA believes that growing pressures on the economic, ecological and social viability of California forestry comprise the best arguments as to why JDSF must be revived to meet the natural resource management challenges of our rapidly changing world.

Given the intensifying market pressures facing California forest landowners, the value of a dedicated public asset such as JDSF to conduct research, demonstrate a range of resource management approaches and to provide regional economic stability is greater than ever. Due to downsizing, restructuring and other competitive pressures, many entities that control private forestland today are not in a position to conduct forestry research. New and non-traditional owners may, in fact, have little knowledge of silvicultural prescriptions and their utility in achieving a variety of forest management objectives. This is where the renewed and ongoing work of JDSF can play a crucial role in helping to nurture long-term forest stewardship, especially in the redwood region.

### **Broken Promises of Rural Prosperity**

CLFA recognizes that there are those who earnestly believe that sustainable forestry is not a worthwhile objective and that the best use of public policy with regard to forestry is to suppress it. CLFA respectfully disagrees. We believe that this view is shortsighted and fails to recognize the ecological and social benefits of encouraging forest landowners – large and small – to retain their lands as working forest greenbelts instead of converting them to rural subdivisions, non-forest commodity production, or other uses.

Forestry professionals argue not for the end of science but for the perpetual beginning of new understandings based upon vigorous and ongoing inquiry. We believe that JDSF's unique public assets *specifically acquired and set aside as a "working" demonstration forest* offer present and future Californians greater benefits under Alternative C1 than any of the others under consideration.

Although Alternative C1 offers comprehensive protection (if not improvements) for non-commodity resources and values such as threatened and endangered fish and wildlife, soils and aesthetics, we're also concerned with non-intrinsic aspects of sustainable forestry – social and economic factors. The DEIR includes important

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<sup>2</sup> Website, <http://forestry.berkeley.edu/forestfuture/>.

<sup>3</sup> *California Forestry 2050: What do we want our forests to look like, and how do we get there?* California Licensed Foresters Association, 2003. Posted under [http://www.clfa.org/whats\\_new.htm](http://www.clfa.org/whats_new.htm).

discussions on Economic, Social and Community Effects<sup>4</sup> as well as JDSF: Social and Economic Setting – Mendocino County<sup>5</sup>.

The DEIS reports on the decline of the timber industry regionally, and in Mendocino County. It also documents a decline in visits to redwood state parks, and states:

*From an economic perspective, the major implication is that visitation and tourism related employment for redwood forests will continue to be an important aspect of our redwood forests but will not be an economic growth sector for areas not close to the San Francisco Bay Area<sup>6</sup>. (Emphasis added)*

The analysis supports what many professional foresters observe in the redwood region. Forest-sector jobs pay better and provide more community benefits.

One of the consistent claims by advocates for more redwood parks (including converting JDSF into more of a park status) is that recreation jobs will replace forestry jobs. The DEIS suggests this line of reasoning is more wishful than right<sup>7</sup>. Recreation jobs pay only 62% of what timber jobs pay. The DEIS goes on to state:

*...at the regional level, a continued decline in the timber-based economy will not be offset by growth in economic activity associated with redwood parks or in other section of the tourism industry<sup>8</sup>.*

*Del Norte County is illustrative of the economic difficulties of a forested county that has gone through the transition from an old growth timber economy to a recreation economy in the absence of a significant young growth timber economy. Although it has some of the most impressive redwood parks in the world, its labor force has actually declined since 1997, and it still has the highest unemployment rate in the region<sup>9</sup>.*

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<sup>4</sup> *Environmental Impact Report for the Draft Jackson Demonstration Forest Management Plan (JDSF DEIR)*, prepared by CDF for the California State Board of Forestry, December 2005, Part III, Section 5, pp. III 25-48.

<sup>5</sup> JDSF DEIR, Part III, Section 6, pp. III 48-56.

<sup>6</sup> JDSF DEIR, Page III-37.

<sup>7</sup> JDSF DEIR, see Table III.13, “Employment and Revenue Effects of Various Timber Harvest Levels”, Page III-55. Also see Table III.7, “Employment and Mean Annual Wage for Selection Occupations, North Coast, 2003 for data supporting the statement (Page III-41): “...each tourism type job pays only about 62% of the annual wages of a timber industry job.”

<sup>8</sup> JDSF DEIS, Page III-48. The paragraph continues, “Most of the tourism and recreation economic activity of the North Coast region is tied to overnight visitors who concentrate their activities along the coastline or on the Highway 101 corridor. Day use visitors to forests, both public and private, are a significant part of the quality of life of local residents and visitors but generate few new jobs or fees in the region.”

<sup>9</sup> JDSF DEIS, Page III-45.

Foresters believe that a false dichotomy is set up when sustainable forestry is pitted against parks, as in pleas to “Save” a forest such as JDSF by removing management. Managing a forest for commercial timber does not preclude opportunities to steward non-commodity, intrinsic resources on the same piece of ground. If this were so, why would JDSF, today after decades of timber harvest, have salmon-bearing waters and habitat for threatened species? Is this not sustainable?

We would also argue that with regard to recreation, the tradeoff between forestry/no forestry is also not a zero-sum game. We’re not arguing against parks, but for JDSF. Recreation can, and does, coexist with resource management in the redwoods and all over the world. In a sense, sustainable forestry is about “saving” resources while at the same time deriving material benefits from them. Given its complexities, it can never be perfected. But its alternative, as documented in the DEIS, can often produce a more bitter harvest.

### **History and Purpose of JDSF**

Jackson Demonstration State Forest has deep roots in California forestry. In the 1940’s, forward-thinking foresters such as UC Berkeley Professor Emmanuel Fritz championed the need for state leadership in helping forest landowners meet the challenge of the times: making a painful transition from old growth timber extraction to the sustained practice of forestry. Legislation authorized state acquisition of cutover lands to be used for research and demonstration purposes in close cooperation with the private sector.

JDSF is the largest and most productive of our system of state forests. (Working state forests such as JDSF are not to be confused with State Parks, which are lands set aside for preservation purposes.)

Since the 1950s, JDSF has been managed by the California Department of Forestry and Fire Protection (CDF). Demonstration forestry, including commercial timber harvest and a wide array of scientific studies, began in the 1960s and continued until the court-ordered freeze began in 2001. Currently, JDSF has a standing timber inventory of more than 2 billion board feet, with annual growth of approximately 65 million board feet<sup>10</sup>. Supporting rich biodiversity including threatened terrestrial and aquatic species, providing aesthetic beauty and respite, employment and forest products, JDSF is a public asset that many are extremely proud of. Ironically, its success has been too apparent, as the visible fruits of its legacy of sustainable forestry are coveted by some who believe that custodial status would be a better use for the land.

### **A “People’s Forest” for 21<sup>st</sup> Century Challenges**

Whereas Professor Fritz and his contemporaries in 1945 were motivated by a concern about adequate regeneration and stocking control in cutover forests, these issues have largely been resolved. In no small measure because of the contributions of JDSF, the transition from old growth pioneer logging to second/third growth forest management has been essentially completed<sup>11</sup>.

CLFA argues, however, that today forestry – and California’s quality of life – face huge new challenges. Rather than a lack of productivity of forestlands, we face their

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<sup>10</sup> JDSF DEIR, Page III-8.

<sup>11</sup> See JDSF DEIR, Page III-47, for a discussion on the transition.

actual loss. **The question before us is, “Should California have a sustainable timber industry, or not?”** Foresters believe that most people of good will answer this question with a clear “YES!”

Of course there is disagreement about the particulars, which is where JDSF comes in. Its unique role as a demonstration forest means that scientists can seek answers to questions that are difficult to answer outside of a dedicated living laboratory. Today’s questions are different than yesterday’s, as tomorrow’s will be different than today’s. A constant is that JDSF is a place where answers can be found – if it is allowed to survive and given freedom to pursue. The alternative, as spelled out in the DEIR, is disturbing:

*The demonstration mandate of the state forests includes demonstration of the long-term physical and financial viability of managing young forests. If the values of long-term forest management are not demonstrated to owners of small to mid-sized forest tracts, there is greater potential for these lands to be converted to other uses, and the economic, social and environmental impacts of expanding forest fragmentation could be magnified across the region<sup>12</sup>.*

Ecology teaches us that everything is related. If small and medium sized parcels drop out of forest management in California, can the remaining large landowners be far behind? What will happen to those lands?

### **Conclusion**

CLFA appreciates the opportunity to comment upon the JDSF DEIS. We’ve taken the opportunity to not just to support Alternative C1, but to argue for a way of life and why its survival and future success is in the long-term interests of California.

Sustainable forestry may be counter-intuitive to some, in that it embraces social and economic considerations along with the ecological. We recognize that it is easier, sometimes, to bypass conservation to meet ideological demands for preservation. But JDSF is not a park, and shouldn’t become one. Parks answer many profound questions, but are silent on others.

Sincerely yours,

Eric A. Schallon, RPF # 2642  
President

Cc: Mr. Stan Dixon, Chairman, and Members, California State Board of Forestry.  
Mr. J. David Colfax, Chair, and Members, Mendocino County Board of Supervisors.  
CLFA Board of Directors.  
Ms. Hazel Jackson, CLFA Executive Director.  
Mr. William Keye, CLFA Government Affairs Specialist.

*The California Licensed Foresters Association, with approximately 750 members, represents the common interests of California Registered Professional Foresters. The Association provides opportunities for continuing education and public outreach to its membership, which*

<sup>12</sup> JDSF DEIR, Page III-27.

*includes diverse professionals affiliated with government agencies, private timber companies, consultants and the academic community. Governed by an elected Board of Directors, CLFA was established in 1980 – seven years after the passage of the landmark California Professional Foresters Law.*