

Friends:

The new 460 page re-submitted NTMP document does contain some improvements, so credit where it is due, but, overall, it's just a rehash of the same old story and mythologies.

Improvements in the new plan:

54 acres in Upper Bull Barn and Upper Hollow Tree watersheds are protected by a conservation easement from commercial logging. In the 2006 NTMP, the Bohemian Club did not even acknowledge that these old growth stands existed.

Greater protection for the fisheries of Smith Creek and Kitchen Creek and for the Bull Barn and Hollow tree tributaries of Smith Creek has been provided.

Finally, in the three and a half years during which the Club has been prohibited from conducting commercial timber operations, it has initiated a program of thinning the genuinely fire prone tanoaks in portions of the property; during that time it has also repaired several road failures and planted redwood seedlings. These are all steps to be supported.

But basic concerns remain unresolved:

Timber harvest levels remain far too high: there is a slight reduction in the annual timber harvest level in the first period from 1.1 million board ft/yr to 875,000 bf/yr but this is still dramatically more than the 500,000 bf/yr level cut from 1984-2005 which caused severe damage to much of the property. The new plan calls for the timber harvest to rise over time to 1.7 million bf/yr. compared to 1.8 million bf/yr in the earlier plan, not much of a change.

Inadequate protection of old growth: Aside from Upper Bull barn and Upper Hollow tree, several other stands and patches of old growth as well as individual trees are not adequately identified or protected.

Large trees targeted: In the first 20 years of the plan and beyond, 40% of the larger conifers (greater than 24 inches diameter) are scheduled for harvest. It is not clear how this will contribute to old growth restoration, the plan's stated goal.

Frequent entries into the same stands: the new plan continues to call for entering each stand on the property once every 15 to 20 years, a very disruptive intensity.

No genuine restoration: There is no mention of, for example, road decommissioning even in the most obvious locations such as the collapsing middle portion of Smith Creek Rd or the portion of Upper Bull Barn Rd which cuts the old growth stand in half. Nor is there any mention of following Dept of Fish and Game's recommendations to improve the fishery of Smith Creek. Finally, the use of controlled burns, now viewed as a critical component of restoration in many western forests as close as Muir Woods, is summarily dismissed.

Intensive herbicide use: will continue to be applied on 60 acres a year. The Club has treated 200 acres with Arsenal since 2004.

Local impacts: 400 to 720 loaded logging trucks will use Bohemian Avenue each spring and fall. Increased fire danger on the Grove property from misguided conifer thinning will endanger local residents.

Inadequate information: the new NTMP omits important information which was included in the first one. A series of strata maps showing changes in forest composition over time is missing. This series of maps allowed the Dept of Fish and Game to understand that most of the larger trees would be removed from the property during the life of the plan (see DFG letter dated 12/1/06). The new NTMP makes no attempt to analyze the effect of commercial logging from 1984-2005 when 11 million board feet of redwood and fir were harvested from the property even though there is a strong correlation between formerly logged sites and currently depleted stands.

Finally, the plan makes no distinction between harvesting of stands which are close to achieving desired old growth characteristics (RD4D) and, at the other extreme, stands which are hardwood dominated and present a genuine fire danger (MH2D and RD4L). Logically, one would expect the emphasis of “restoration” forestry to focus on fire prone and under-stocked areas which represent a small percentage of the forest, but one finds no such distinction made here. As we said three years ago, this is commercial timber harvesting disguised as fire hazard reduction.

3/3/09

Additional Comments (4/3/9)

Recommended logging methods are contradictory and unworkable.

The logging prescription in the new NTMP states at p. 125: “Crowns of dominant trees are thinned (ie, 40% of the largest conifers are removed (p. 137-8; P.170) so they are separated (clearcuts up to one acre covering 20% of the of each logged area (p.123) but shade is retained to reduce brush growth.” So, how can the loggers both open up the stands and leave them shaded?

It is worth noting that the NTMP concedes that “tanoak ...responded vigorously” under the more moderate single tree selection logging which occurred from 1984 to 2005. It will presumably respond all the more vigorously under the new more aggressive regime.

“NTMP contains no fire hazard assessment of either the 1984-2005 period of logging or the new proposal”

The revised NTMP asserts that “earlier (forest management) goals did not recognize fire hazards as significant (p.116)”. However, in 1986, Bohemian Club member and forester Ralph Osterling submitted a proposal to the Board of Directors which list as number one priority “ Provide safety from fire.” The same memo went on to say that “ fuel management is the prime consideration.” This memo was submitted for the record in 2006. Similarly, as early as 1975-76, and continuing for many years, Bohemian Club Reports of the President and Treasurer echo this preoccupation with fire hazard, so it is a complete rewrite of history to claim, as the revised NTMP does, that logging was not motivated by fears of fire.

More accurately, it could be said that, after 22 years of logging, the Club failed in its primary stated goal of reducing risks of fire. Yet there is no analysis of the impacts of this period of logging and no explanation presented as to why logging at a greater intensity could possibly improve fire safety. This is a major omission in this document.