

CALIFORNIA LICENSED FORESTERS ASSOCIATION
P.O. Box 1516 – Pioneer, CA 95666

April 24, 2003

Board of Forestry and Fire Protection
Chairman Bob Heald, Forest Practices Committee
P. O. Box 944246
Sacramento, CA 94244-2460

RE: Proposed Oak Retention Standards

Dear Bob:

We all recognize the role of wildlife in our everyday activities, whether enforcing Forest Practice Rules or writing new Timber Harvesting Plans. The presence and proportions of hardwoods, in the form of Group 'B' species is a part of every management plan. As your committee considers regulatory measures to enhance the biological productivity of California's managed timberlands, the California Licensed Foresters Association (CLFA) would like you to consider some of the following facts in your committee's deliberations.

1. While the proposed language you have before your committee is a distinct improvement over that offered a year ago, there is still a strong question of necessity. In recent 2003 Board of Forestry (BOF) meetings, the Forest & Range Assessment Program (FRAP) disclosed that over 80,000 acres of oak woodlands were recently lost to urban encroachment in California. Urban encroachment seems to be the overwhelming threat to wildlife using deciduous oaks, not forest management.
2. In 2002, FRAP used USFS Forest Inventory Assessment (FIA) data to deduce amounts and trends for deciduous hardwoods (especially black oak) in California. We provided evidence at that time from noted biologist Dr. Barry Noon that stand-based extrapolations from such data were statistically unjustified.
3. In addition, some FRAP data is based on LANDSAT imagery that uses 70-meter pixel imagery. While this may be the most readily available small-scale imagery, it lacks the resolution needed to make accurate conclusions on which to base regulatory necessity.

4. A research paper¹ by Dr. Barrett A. Garrison detailed the effects of timber harvesting on fauna on four 52-acre stands in Placer County, was also presented as justification for new oak retention rules. While this is a diligent research effort, we cannot see its applicability to all of California's managed timberlands because of the limited sample size and lack of statistical replication.

5. The final point to consider is the incremental regulatory burden placed on the timberland owner in preparing a timber harvesting plan. As these costs grow, the incentive to manage timberland diminishes. Timber product markets are currently at historic lows and timber harvest plan preparation costs are at an all-time high. We are growing precariously close to losing the incentive to buy and hold timberland in California.

In consideration of the foregoing facts, CLFA recommends that you defer this rule package until there is a documented regulatory necessity, addressable by the BOF. It would also be advisable to wait until the effect of last year's rules requiring the analysis of deciduous hardwoods in the Cumulative Impact Analysis portion of the plan, are known. We believe that the existing rules allow solid protection for wildlife under 14-CCR 897(b)(1)(B) and by including the Department of Fish & Game on the review team under 14-CCR 1037.

Please consider these comments, on behalf of our 770 members who represent the majority of the professional expertise used to enforce and comply with our State's Forest Practice Regulations (FPR).

Very truly yours,

William E. Hultgren
Forest Practices Committee

Bonnie J. Burchill
President

¹ Garrison, Barrett A. et al, 1998, California Department of Fish & Game, "Progress Report: Wildlife Populations And Habitat Attributes Of Montane Hardwood-Conifer Habitat In The Central Sierra Nevada"