



CALIFORNIA  
LICENSED  
FORESTERS  
ASSOCIATION

P.O. Box 1516 · Pioneer, CA 95666  
phone · 209.293.7323 fax · 209.293.7544  
email · clfa@volcano.net web · www.clfa.org

October 3, 2003

Board of Forestry and Fire Protection  
Attn: George Gentry  
Acting Executive Officer  
P.O. Box 944246  
Sacramento, CA 94244-2460

RE: Hardwood Retention - 2003

Dear Board Members:

The California Licensed Foresters Association (CLFA) submits the following comments to the record for the consideration and review of the Board of Forestry (BOF) on the proposed rule making package titled "Hardwood Retention – 2003". CLFA has reviewed the changes made to the proposed package within the 15-day notice circulated September 24, 2003. CLFA recognizes that the proposed package, as amended, addresses Comment 9 in our letter to the BOF dated August 29, 2003 regarding the proposed package. However, CLFA continues to strongly oppose the proposed package, as amended, for the same reasons outlined in our previous letter.

Page 3 of the 15-day notice amends the initial statement of reasons for the proposed package to add a report presented to the BOF at the June, 2003 Forest Practice Committee meeting. Comment 5 in our previous letter contains the following statement: "During BOF Forest Practice Committee discussions of the proposed package, issues were raised by the California Department of Fish and Game concerning a lack of disclosure from RPFs within the cumulative impacts portion of THPs, even after the 2003 amendments". This statement is based on information contained in the report now amended into the initial statement of reasons for the proposed package. After the June presentation and subsequent discussion of this report, the Forest Practice Committee unanimously concluded that education was needed regarding the issue of hardwoods.

CLFA would like to reiterate the commitment we made during public testimony at the September 16, 2003 public hearing. Consistent with discussions that occurred during the June, 2003 BOF Meeting in Sonora, CA, we are committed to prioritizing a workshop in 2004 addressing hardwood resources. At this time, we believe that education and dialogue within professional disciplines represents a much more promising approach to deciduous oak conservation than additional prescriptive forest practice regulations.

In summary, CLFA asks that the BOF not approve the proposed package. Please consider these comments on behalf of our members who represent the majority of the professional expertise used to enforce and comply with our State's Forest Practice Regulations.

Very truly yours,

Gary F. Howard, RPF #1017  
President, CLFA