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June 4, 2019

State Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA, 94244-2460
Submitted via: PublicComments@BOF.ca.gov

RE: Stocking Standards Amendments for the Southern Subdistrict

Dear Members of the Board of Forestry,

I understand that the Management Committee is discussing amendments to the regulations regarding Stocking Standards within the Forest Practice Rules. As pointed out by the March 2019 Proposal for Updating CA Forest Practice Rules Stocking Standards from the William Main Seminar Research Group, current stocking standards are too high and do not mimic optimal stocking levels.

A stocking standard of 300 trees/acre on Site I and II lands and 200 trees/acre on Site III, IV, and V is more appropriate. Please include the Southern Subdistrict of the Coast Forest District in a rule change to bring the stocking standards more in-line with modern science. In addition, the Southern Subdistrict has unduly limiting stocking language under 14 CCR 913.8(b)(6) that should be revised. The first and third sentences of subsection (b)(6) should be deleted.

14 CCR 913.8(b)(6) currently states: *The logging area shall meet the stocking standards described in 14 CCR 913.8(a) within five years following completion of timber operations. Hardwoods, as per 14 CCR 912 "Commercial Species", designated for management may be counted for stocking. If such hardwoods are counted to meet stocking requirements, at least 20% of the total harvest area cut under 14 CCR 913.8(a) shall be planted with conifer trees at the rate of at least 1112 well-distributed trees per ha (450 trees/acre).*

Projects that propose to utilize 14 CCR 913.8(b) are those where the regeneration method described in subsection (a) is not silviculturally appropriate or feasible in the professional judgment of the RPF. Forest thinning projects proposed to occur in stands with naturally low conifer stocking, such as mature oak woodlands with low levels of historic conifer stocking and many young invading Douglas-fir trees, do not have conditions suitable to meet stocking according to subsection (a), nor is the desired restoration treatment intended to increase the site occupancy of Group A species.

It is appropriate to count hardwoods to meet stocking requirements; however, it is not appropriate to require that at least 20% of the total harvest area cut under 14 CCR 913.8(a) be planted with conifer trees at the rate of at least 450 trees/acre, as a result. First, there is no reason to presume that a plan which includes management according to subsection (b) also includes management according to subsection (a). Second, requiring planting at a density of 450 trees per acre is not silviculturally appropriate for most areas managed by either (a) or (b) in the Southern Subdistrict. The goals for several stands I manage are to protect and enhance the prominence and health of large, specimen-quality trees representing a range of native species, including both hardwoods and conifers. The rules should allow for restoration thinning treatments to preserve existing species diversity and forest structure, to protect the stand from catastrophic disturbance, and to promote resilience to environmental stressors.

Please revise the stocking standards of 14 CCR 913.8(b)(6) to allow for modern conservation practices. Please don't hesitate to contact me if you have any questions at (831)426-1658 or nadahamey@gmail.com.

Sincerely,

Nadia Hamey
RPF #2788