Potential Use of White Paper on the Retention of Mature Tanoak

The white paper would be a summary of current research and information on the value of retaining mature tanoak as a component of a redwood-Douglas fir-tanoak or Douglas fir-tanoak forest. The document could serve as a source for Plan Submitters to use in the Cumulative Impacts Assessment, particularly under the evaluation of impacts to Biological Resources. Tanoak provide acorn crops that are a forage source for multiple species, are a source of multi-story canopy, and are a component of hardwood species within California forests. A resource alerting Registered Professional Foresters to the importance of mature tanoak as a habitat component may result in those trees being retained more frequently, either as a component in uneven-aged management or intermediate treatments under §913.11(c), through the variable retention special prescription under §913.4(d), or via a new regulatory pathway.

Summary of Rules Overview on Tanoak as Compared to Oaks in the genus *Quercus*:

Tanoak is a Group B Commercial Species in all forest districts. Black oak is also a Group B Commercial Species in all forest districts, while Oregon white oak is a Group B Commercial Species in the Coast and Northern forest districts. There are 21 total true oak species in California, of which 14 are trees – no other species of oak is a Commercial Species.

The rules have protections for black oak and white oak to restore or preserve single-species stands within oak woodlands (§913.4 [§933.4, §953.4] (f) White and Black Oak Woodland Management and §1038(e) Oak Woodland Management Exemption. Preservation of tanoak under similar conditions does not replicate natural stand conditions, creates circumstances where Sudden Oak Death can spread more rapidly, and does not provide the habitat advantages that incentivizing the growth of mature tanoak aims to address.

Sudden Oak Death provisions under § 1052.5. Emergency Notice for Outbreaks of Sudden Oak Death Disease apply to all host hardwood species, this includes tanoak, black oak, Pacific madrone, and California laurel/pepperwood.

Under § 959.15 Protection of Wildlife Habitat [Southern], 400 sq. ft. basal area of oak per 40 acres, if present at the time of timber harvest, should be retained and protected. Preference is given to deciduous oaks (a group that includes black oak, Oregon white oak, blue oak, and valley oak). Oaks should be retained on deer migration corridors, holding areas, or key ranges, as designated by CDFW, emphasizing the role of mast production supporting wildlife habitat. This rule does not include tanoak.

PRC § 4621, Conversion identifies “restoration and conservation forest management activities” that allow the removal of commercial species if necessary to achieve specific forest health and ecological goals. These goals specifically include “oak woodlands” as a habitat where removing commercial species is permitted, although other “ecologically important or unique habitats” can also meet the standards for “growing of timber”.

Other Rule Text Considerations

§ 912.7(b)(3), [§ 932.7(b)(3), § 952.7(b)(3)] Resource Conservation Standards for Minimum Stocking states “To the extent basal area standards are specified in the Rules in excess of 14 CCR § 912.7(b)(2) [932.7(b)(2), 952.7(b)(2)], up to fifteen (15) square feet of basal area of those standards higher than the minimum may be met by counting snags, and decadent or deformed trees of value to wildlife. The minimum size shall be twenty (20) inches or greater d.b.h. and twenty (20) feet or greater in height.”

Under § 913.11(c), hardwood trees can be used to meet stocking requirements in uneven-aged management and intermediate treatments:

“(c) In a THP, NTMP, or WFMP, MSP is achieved by:

(1) For evenage management, meeting the minimum stand age standards of 14 CCR § 913.1(a)(1), meeting minimum stocking and basal area standards for the selected silvicultural methods as contained in these Rules only with group A species, and protecting the soil, air, fish and wildlife, water resources and other public trust resources through the application of these Rules; or

(2) For unevenaged management, meeting minimum stocking and basal area standards for the selected silvicultural methods as contained in these Rules, and protecting the soil, air, fish and wildlife, water resources and other public trust resources through the application of these Rules.

(3) For intermediate treatments and special prescriptions, complying with the stocking requirements of the individual treatment or prescription.”

Under §913.4(d), Variable Retention, structural elements or biological from the pre-harvest stand for integration are retained in the post-harvest stand to achieve various ecological, social and geomorphic objectives. The existing rules