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July 11, 2019

Dr. J. Keith Gilles (Chair)  
California Board of Forestry and Fire Protection  
PO Box 944246  
Sacramento, CA 94244-2460

Re: Stocking Standards (Coast Southern Subdistrict)

Dr. Gilles,

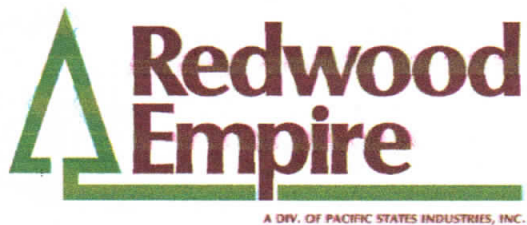
For over 30 years Redwood Empire Sawmills has managed thousands of timberland acres in San Mateo, Santa Clara, and Santa Cruz Counties. Through timber harvesting, fuel treatments, and timber stand improvements we have worked to create healthy and resilient ecosystems. This letter is to provide comments regarding the ongoing revisions the stocking standards in the Southern Subdistrict of the Coast District. We anticipate that this process will result in more flexibility to address the daunting forest health hazards of today and of the future.

Similar to most of the California landscape, the ecosystem of Southern Subdistrict was created and maintained by fire. During the 1970s and 1980s stocking standards were designed to increase the stocking levels of California timberland. Today the forests of the Santa Cruz Mountains are densely stocked with conifer and hardwood species. Forest fuels and extreme temperatures have increased while more development has encroached into the wildland interface. Disturbance based plant and animal species have been negatively impacted as most of the early successional forest stands have disappeared from the region.

To counterbalance the impacts of overstocked forests, we request that the stocking standards in the Southern Subdistrict be reduced to the standards recently deemed appropriate for the rest of the Coast District of California. There is no justification to maintain an elevated understory stocking in forest types already exhibiting significant fuel loading. Within this region, most regeneration efforts occur on more marginal sites, often associated with hardwoods and brush. These landscapes may not have the site capacity to maintain a high point count and certainly would have difficulty producing a fully stocked stand of healthy conifer. Land owners may want to establish conifer species in these marginal areas, however requiring a point count of 450 is often unrealistic. Another option would be to remove the point count requirement from 913.8(b). This would allow landowner to manage hardwoods and plant conifers to a level that is site specifically appropriate.

In addition to revising the regeneration stocking standards, the forest health of the Santa Cruz Mountains would be well served if the Board would remove the requirement in 913.8(a) to retain 50% of the trees between 12-inches and 18-inches DBH.

**913.8 (a)** *Leave uncut a well-distributed timber stand after timber operations have been completed on the logging area that is at least 40% by number of those trees 45.7 cm (18 in.) and more d.b.h. present prior to commencement of current timber operations and at least 50% by number of those trees over 30.5 cm (12 in.) d.b.h., but less than 45.7 cm (18 in.) d.b.h.*

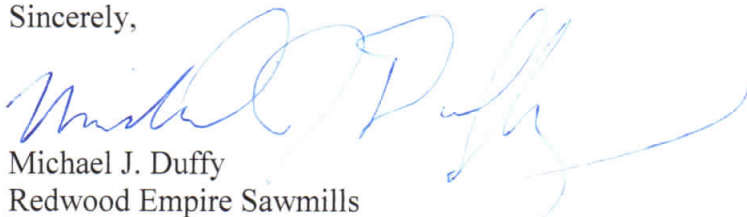


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This rule has resulted in the high stem count retention of smaller trees in the region. For decades this served an important purpose when improving stand density was a priority. As the stem counts increased and fire conditions have worsened, fuels management has become a much greater objective. The 12-inch to 18-inch trees are not high value commercial trees. The risk of losing this stand component to fire is much greater than to timber harvesting. Removing the 50% retention standard will allow landowners the flexibility to effectively control understory fuels without the risk of running afoul of State regulations.

As our forested landscape changes, so must our methods of management. It is our hope that by reducing the Southern Subdistrict point count requirements to equal those in the rest of the State, and by eliminating the requirement to maintain a high stem count of small diameter trees, landowners in the Santa Cruz Mountains will have a greater ability to maintain healthy forest ecosystems.

Sincerely,



Michael J. Duffy  
Redwood Empire Sawmills