

HAMEY WOODS  
267 Sunlit Lane  
Santa Cruz, CA 95060

February 18, 2020



Board of Forestry and Fire Protection  
Attn: Eric Hedge  
Regulations Program Manager  
P.O. Box 944246  
Sacramento, CA, 94244-2460  
Submitted via: [Eric.Hedge@BOF.ca.gov](mailto:Eric.Hedge@BOF.ca.gov)

**RE: Need for Southern Subdistrict & Big Sur Restoration Forestry Rule**

Dear Members of the Board of Forestry,

The Forest Practice Rules need updating to allow native species restoration, forest health improvement, and fire hazard reduction that can be permitted within a reasonable budget.

Management of eucalyptus in parts of the Southern Subdistrict of the Coastal Zone is currently severely hampered. Removal of eucalyptus from the Board of Forestry purview has made permitting eucalyptus harvesting projects a more daunting undertaking in some counties, and a Coastal Development Permit (CDP) is now often required.

In Monterey County, in 2012 when eucalyptus was on the commercial species list, I wrote a THP for removal of 15 acres of eucalyptus that was smothering timberland and non-timberland spanning Garrapata Creek and Palo Colorado Canyon. The project, THP #4-12-004 MON, was successfully completed on Big Sur Land Trust property, and in the nick of time before the Soberanes Fire. The change in commercial species status in 2013 put projects that propose to remove eucalyptus trees in the realm of requiring a Coastal Development Permit, a more expensive and less appropriate permit than a THP. Since then I'm not aware of many significant eucalyptus control projects going forward.

**Reinstating eucalyptus on the commercial species list would renew the THP as an appropriate permitting option where the CDP is the only permitting alternative.**

The types of forest management projects that address the needs of modern forests and the desires of forest landowners' are currently impeded by the rigidity of the Forest Practice Rules, particularly in the Southern Subdistrict. A frequent condition of oak woodlands and madrone forests is the invasion by Douglas-fir. 14 CCR 913.8(b)(6) requires that if hardwoods are counted for stocking, 450 conifer trees/acre must be planted. Even if the restocking requirement is reduced to 200 TPA as proposed, replanting conifer trees is not appropriate. As proposed in THP #4-12-004 MON, regeneration species should be matched specifically to the sight, rather than relying on antiquated stocking standards.

Similar issues apply to managing restoration of other vegetation types, such as Monterey pine invasion of oak woodland, coastal scrub, or grassland. In addition to stands of native Monterey pine, areas in the Southern Subdistrict are planted with an exotic knobcone/Monterey pine cross, which are rapidly regenerating where they don't belong, thereby threatening native habitats and increasing fire hazards.

**Special Prescriptions for native vegetation restoration are called for in the Southern Subdistrict to allow fuels management without the requirement to follow-up by planting conifer seedlings.**

Another limitation to projects being implemented in the Coastal Zone is that the Emergency Notice for Fuel Hazard Reduction (14 CCR § 1052.4) is not currently an option. As mentioned above, in the Coastal Zone a Timber Harvesting Plan is exempt from a Coastal Development Permit, but an Emergency Notice or Exemption is not. This means that it is inherently very expensive to secure permitting which allows for maintenance of forest fuel to improve forest health and reduce wildfire risk. Streamlined permits should incentivize forest landowners to improve the condition of their forests to be more resilient to droughts and wildfire.

A THP is an expensive and complex permit that on average costs between \$50,000 and \$75,000 to obtain. In most instances a THP is only necessary when forest products are sold. Under most circumstances, fuel reduction projects do not involve selling of commercial products. These kinds of fuel reduction projects primarily cut brush, small trees, and dead trees which there is no market to recover costs from. This kind of work is thus completely out of pocket and often costs more than \$3,000 per acre to complete. The extreme permitting costs often make small projects impractical and add significant expense to grant-funded forest health and fuel break work.

The challenges in the Southern Subdistrict, both silvicultural and regulatory, are unique in nature and warrant the attention of the Forest Practice Committee and the full Board. Please consider holding a Special Workshop to find and propose solutions to some of our modern forest management stocking issues.

Thank you for addressing these important issues. Please don't hesitate to contact me if you have any questions at (831)426-1658 or [nadiahamey@gmail.com](mailto:nadiahamey@gmail.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Nadia Hamey". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Nadia Hamey  
RPF #2788