

RANGE MANAGEMENT ADVISORY COMMITTEE

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May 9, 2023

Management Committee
Board of Forestry & Fire Protection

To Whom it May Concern,

In light of the Management Committee's review of the Joint Policy on Hardwoods (Policy), the Range Management Advisory Committee (RMAC) would like to provide comment.

Initially the RMAC would like to inquire regarding about the utility of adopting an updated Policy, as it appears to be legally unenforceable.

Notwithstanding the question of legality or need for the Policy, if the Policy is to be revised the RMAC requests that the species of hardwoods of management concern in the state of California be explicitly identified. The original Policy states in its Introduction that there are more than 30 species of hardwood trees in California, but only four are identified in the Policy (Part IV Section A): blue oak (*Quercus douglassii*), black oak (*Quercus kelloggii*), valley oak (*Quercus lobata*), and Engelmann oak (*Quercus engelmannii*). We recognize that the Policy was established to conserve more than just these oak species, but also the larger plant communities and ecosystems which they anchor. However, the RMAC has concerns that the Policy generally lumps all hardwoods—with no clear definition of what this term includes—and their associated ecosystems together as if they merit similar conservation and protection in all places at all times, which the RMAC does not believe is scientifically supported. If the Policy is to be updated and adopted, the RMAC requests that this begin with a thorough assessment of hardwood resources in the state (Part V Section G) with a focus on hardwood ecosystem conservation and protection by major hardwood ecosystem type.

The RMAC is available to provide additional information and collaboration to the Management Committee if desired. Thank you for your time and attention to this Policy.

Sincerely,

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