

HAMEY WOODS  
267 Sunlit Lane  
Santa Cruz, CA 95060

October 14, 2022



Board of Forestry and Fire Protection  
Attn: Regulations Priority Review  
P.O. Box 944246  
Sacramento, CA, 94244-2460  
Submitted via: [PublicComments@bof.ca.gov](mailto:PublicComments@bof.ca.gov)

**RE: 2022 Regulations and Priority Review**

Dear Members of the Board of Forestry,

Thank you for this opportunity to comment on suggested regulatory modifications which would either clarify existing rule language to better achieve the intended resource protection, or would reduce regulatory inefficiencies and maintain the same or better level of protection.

**14 CCR § 917.2, Treatment of Slash to Reduce Fire Hazard [Coast]**

The Forest Practice Rules need updating to allow for pile burning and broadcast burning in the Coastal Commission Special Treatment Areas of the Coast Forest District. There is a significant need for effective fuel reduction techniques to manage fuel loading, particularly under post-fire conditions. 14 CCR § 917.2, Treatment of Slash to Reduce Fire Hazard excludes Coastal Commission Special Treatment Areas (CCSTA), to the detriment of properties within the CCSTA. Swanton Pacific Ranch, the school forest of Cal Poly State University is located in north Santa Cruz County, and the Non-Industrial Timber Management Plan, #1-07NTMP-020 SCR, includes approximately 235 acres of the Molino Creek CCSTA. Swanton Pacific Ranch is the recipient of a Cal Fire Forest Health Grant that includes pile burning within its scope and we look forward to implementing future broadcast burning projects on the Ranch. Proposed pile and broadcast burning operations are in keeping with the goals of the CCSTA, and will better protect the scenic resources within the CCSTA. Please revise 14 CCR § 917.2, to allow treatment of slash to reduce fire hazard within the CCSTA.

**14 CCR § 921.4, Stocking Requirements [Coast, Southern, STA]**

14 CCR § 921.4, Stocking Requirements [Coast, Southern, STA] still requires that stands be overstocked. The point-count requirement of 450 countable trees per acre on Site I and II lands and 300 countable trees per acre on Site III, IV, and V lands is too high and will lead to dense stands with high fire hazard, which are overstocked compared to historic conditions. The stocking targets in the Coastal Commission Special Treatment Areas in the Coast Forest District should be reduced given the objective of maintaining a resilient stand that can resist predicted climatic stress.

**Exemptions [Coast]**

A major limitation to projects being implemented in the Coastal Zone is that Exemptions do not apply. Most of the work that needs to happen is non-commercial and the requirement to develop a Coastal Development Permit or Public Works Plan is cost-prohibitive. It would be beneficial to streamline permitting such that Exemptions are allowed in the Coastal Zone so that forest landowners can afford to improve the condition of their forests to be more resilient to droughts and wildfire.

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.

Nadia Hamey  
RPF #2788