



November 18, 2015

Mike Miles, Chairman
Forest Practice Committee
California Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

Re: October Technical Rule Addendum 2 Plead; Greenhouse Gas (GHG) Impacts

Dear Chairman Miles and Fellow Committee Members,

In your Board's consideration of greenhouse gas (GHG) analysis requirements, it is our opinion that the specific scope of each project should dictate the complexity and necessity of such analysis. Our company forestlands (as well as those of our forest landowner clients) are subject to the rigorous California Forest Practice Rules of the Southern Subdistrict of the Coast District. These rules require single tree selection or group selection, and prohibit even-age management. There are significant riparian buffers, exclusion areas and canopy retention standards. Generally speaking, managed forestlands in the Southern Subdistrict exhibit continuous canopy from stream bank to ridgetop. Our log inventory analysis indicates that average tree size has consistently increased during the past four decades. Independent analysis concludes that between 1948 and 1999 in Santa Cruz County "The average rate of redwood growth exceeded the rate of removal by over five times"¹.

Coincidentally, your Board's Management Committee is considering discussing the potential for small landowner relief. This is a process that is both desperately needed and long overdue. As recent as 1990, the cost to landowners associated with preparing a state approved Timber harvest Plan (THP) was approximately \$5,000 per plan. Today these costs have ballooned to between \$20,000 and \$60,000 (or more). The additional costs of preparing GHG analysis will undoubtedly place another economic burden on these landowners. The predictable outcome is

¹ Vande Pol, M. (2001). *Natural Process - That Environmental laws May Serve the Laws of Nature* (pp. 80-82).

FPC 3.6

that more of them will forego sustainable timber harvesting in favor of pursuing other land uses on their property.

It makes little sense to place additional plan preparation costs on landowners whose forests are sequestering carbon and not contributing to increased GHG emissions. A better approach would be a categorical exemption for de minimis projects. These exemptions could be based on size of project, silvicultural method or a combination of factors. Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Bob Berlage". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Bob Berlage
Communications Director
