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Board of Forestry and Fire Protection
Attn: George Gentry
Executive Office
P.O. Box 944246
Sacramento CA 94244-2460

RE: Need for Clear Definition of "Timberland."

Per PRC 4526, *"Timberland" means land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees.*

What does this really mean? How is it to be assessed, documented and measured in the field? No definition is provided by the Forest Practice Rules; see 14 CCR 895.1 for "Timberland". There is none, and by reference we must rely on the above mentioned PRC definition.

With the expectation that there will be continual pressure to convert lands that are now growing or had a history of growing commercial species, and to facilitate coverage typing for timber management plans, a quantitative or at the very least a more clear definition of "timberland" is long overdue.

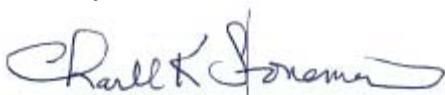
The California Timber Yield Tax Law, section 38103.1, attempts to provides a quantitative definition by which, *"Timberland" means privately or publicly owned land that is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, and which is capable of growing an average annual volume of wood fiber of at least 15 cubic feet per acre.*

Cubic foot to board foot "rule-of-thumb" conversion factor in general use is 1 cubic foot of solid wood = 6 board feet, Scribner Decimal C log scale. So 15 cubic feet equates [by example 15 cu. Ft. X 6 bf/cu. ft.] to 90 board feet. But is this a total capable production (a yield of) 90 board feet per acre at some given age, or is it defining "timberland" to those lands that are capable of at least growing 90 board feet of wood fiber per acre per year? This definition even lacks clarity on a number of points.

In trying to document what is and what is not timberland for a client, we are currently using our best judgment based on soils information, history, current vegetative cover types, estimated growth potential of the site to support a commercial species, drip line occupancy, etc., to make this determination. It would be helpful if the Board would provide a standard and clear definition.

Thank you for your time and consideration.

Sincerely,



Charll K. Stoneman
Registered Professional Forester #2375