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This rule has resulted in the high stem count retention of smaller trees in the region. For decades this served an important purpose when improving stand density was a priority. As the stem counts increased and fire conditions have worsened, fuels management has become a much greater objective. The 12-inch to 18-inch trees are not high value commercial trees. The risk of losing this stand component to fire is much greater than to timber harvesting. Removing the 50% retention standard will allow landowners the flexibility to effectively control understory fuels without the risk of running afoul of State regulations.

As our forested landscape changes, so must our methods of management. It is our hope that by reducing the Southern Subdistrict point count requirements to equal those in the rest of the State, and by eliminating the requirement to maintain a high stem count of small diameter trees, landowners in the Santa Cruz Mountains will have a greater ability to maintain healthy forest ecosystems.

Sincerely,

Michael J. Duffy
Redwood Empire Sawmills