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Members of the Board of Forestry

RE: change in Basal Area Stocking Standards

As the Board begins its review of Basal Area stocking standards, I would like to address several areas for potential revision as I have struggled to develop my own NTMP.

CCR 14 § 912.7(b)(3)<sup>1</sup> references an allowance for basal area for snags, and decadent or deformed trees of value to wildlife. The current rule language is silent as to whether this includes hardwoods as well as conifers. I believe that it has become clear that some hardwood species are important to certain avian and mammals, Great Gray Owl, California spotted owl, and fisher for nesting, denning and resting sites. I would suggest making a specific reference to hardwoods in the current rule language. It seems that the diameter and height minimums seem excessive for Site Classes I and II if larger trees are unavailable. I suggest considering the diameter and height standards of 912.7(b)(3)(C) as suitable for all site classes.

CCR 14 § 912.7(d)(1)(A-D) The current language to justify use of Group B species seems onerous for owners who wish to retain some hardwoods for aesthetic, wildlife, or other ecological reasons as explained in the THP, NTMP or similar permitting document. This section should perhaps be examined in light of the rules regarding White/Black Oak woodland management CCR 14 913.4(e and f) while permitting lower hardwood retention than the 35 sq. ft. under 913.4(f)(7).

CCR 14 § 1071(a) measures basal area for stocking purposes in stems one (1) inch and larger at dbh. PRC section 4528 defines a countable tree as one two years or older that is alive and healthy with at least one quarter of its length having a live crown. Theoretically, this would permit many understory conifers, often white fir or incense cedar, in mixed conifer stands to count towards the basal area standard although it is unlikely these trees will release and grow vigorously if dominant, codominant or even intermediate trees are removed as a part of an unevenaged stand harvest.

CCR § 1072.5 requires that each plot have the minimum basal area specified under CCR § 1071(a) [85 sq. ft. on Site I and 50 sq. ft. on Site II or lower]. Strict enforcement of this rule does not recognize the heterogeneity of vegetation, conifers, shrubs and hardwoods present on many smaller ownerships based on past management or harvesting practices, nor the potential ecological values these nonconiferous species may have for wildlife.

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<sup>1</sup> For brevity, the FPR sections for the Northern, and Southern Forest Practice Districts are not cited, but potential changes for these parallel sections should be considered as well.



