

Nadia Hamey
HAMEY WOODS
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January 14, 2020

Board of Forestry and Fire Protection
Attn: Eric Hedge
Regulations Program Manager
P.O. Box 944246
Sacramento, CA, 94244-2460
Submitted via: PublicComments@BOF.ca.gov

RE: Southern Subdistrict and Marin Co. Stocking Amendments, 2020

Dear Members of the Board of Forestry,

Thank you for proposing amendments to improve the suitability of the stocking standards under 14 CCR 913.8 for forest management in the Southern Subdistrict.

The proposed lower point count provides for better resource conservation by reducing competition between trees for the essential resources of sunlight, water and nutrients needed for photosynthesis, and eliminates the need for expensive pre-commercial thinning treatments and resulting fuel buildup that can contribute to wildfire risk and carbon release.

Striking the requirement to plant 450 trees per acre if Group B species are counted for Stocking will make prudent forest management possible. It will allow forest managers to protect and enhance the prominence and health of large, specimen-quality hardwood trees, to preserve existing species diversity and forest structure, to protect the stand from catastrophic disturbance, and to promote resilience to environmental stressors. Planting copious conifer trees per acre would result in an increase in small diameter trees, which is inconsistent with forest health and ecological goals in this forest context.

The removal of eucalyptus from the commercial species list in 2013 justifies the amendment to 14 CCR 913.8(d). However, the issue of much-needed eucalyptus management in the Coastal Zone for fire hazard reduction and native species restoration remains a serious issue. Removal of eucalyptus from the Board of Forestry purview has made permitting eucalyptus harvesting projects a more daunting undertaking in the Coastal Zone, with the alternative being a Coastal Development Permit. The pace and scale of fire hazard reduction and native species restoration projects on the coast would benefit from the Board of Forestry working with the Coastal Commission to streamline permitting for habitat improvement and fire resiliency projects.

Thank you for addressing these important issues. Please don't hesitate to contact me if you have any questions at (831)426-1658 or nadahamey@gmail.com.

Sincerely,

Handwritten signature of Nadia Hamey.

Nadia Hamey
RPF #2788