



November 8, 2013

Mr. Mark Andre, Chair  
Board of Forestry, Forest Practice Committee  
PO Box 944246  
Sacramento, CA 94244-2460

*Reference: Potential Oak Restoration Prescription*

Dear Mr. Andre and committee members,

In order to determine the interest among RPFs to have a prescription that could be utilized to restore oak woodlands, or other species that need to fully occupy a site, CLFA conducted a survey of its membership. The survey was kept simple to encourage responses and the results seemed effective.

The specific question asked was:

*The Forest Practice Committee of the Board of Forestry is considering modifications to the FPRs to allow for a special prescription to restore or enhance oak woodlands similar to the recently adopted rules for aspen, meadow and wet area restoration. For oak woodland restoration the prescription could allow for removal of conifers to prevent them out-competing the oaks. Alternately such a prescription could also be applied to other species in need of habitat restoration such as various species of plants that need maximum sunlight. These prescriptions could be used in general to remove conifers and be exempt from stocking to allow oaks or other species to fully occupy a site. Do you believe that if such a prescription were available that you would put it to use?*

The potential responses for this question were “Certainly”, “Possibly” and “Unlikely”.

Additionally, space was provided for respondents to add details regarding where and when such a prescription might be useful.

## Results

CLFA received 98 responses to this request including comments on where and when this prescription could be used, these results are generalized below.

Responses to the question were:

Certainly – 36%

Possibly – 43%

Unlikely – 21%

Nearly 80% of the respondents indicated that they would certainly, or might possibly, utilize such a prescription. The comments received were variable though some generalizations can be made.

Thirty-five of the comments suggested that the prescription would be useful in areas of oak stands that are being encroached upon by conifers, Douglas-fir primarily. Some of these comments included pine as the competitor and several included meadows and grasslands as possible habitat types to enhance in addition to the oak stands.

There were 15 responses which were positive to using the prescription in settings similar to above and typically based on the improvement of wildlife habitat. These included the enhancement of deer winter range habitat and protection of ecotone areas along with areas of low conifer site.

Five responses suggested that the prescription could be used in association with fuel treatments to enhance fire protection zones around residential structures and communities.

There were two responses which indicated instances where oak restoration prescriptions were recently utilized under the current regulatory system. One site was at the Wiskeytown National Recreation Area and the other at Lake Siskiyou. Both of these examples may be good demonstrations of how this prescription could be used.

Six of the respondents suggested that though no obvious use for the prescription existed in their area they could see how it might be useful in other locations and circumstances.

There was one response which stated simply that the prescription could be used for a variety of rare plants. Several other respondents, primarily indicated above, also included mentions of using the prescription for rare plants in addition to other goals.

Though the responses were nearly 80% positive regarding this possible prescription there were some detractors.

Four respondents stated simply that there was no need for such a prescription and three indicated no need for the prescription in the redwood region. There was at least one response which questioned the need for the prescription given the regulatory options that are available already.

There were five responses which suggested a concern for abuse of such a prescription or potentially improper use. The abuses would come in the form of project proponents that essentially want to cut and run. Improper use could be a situation where a stand may have always been mixed conifer/hardwood and such habitat types are quite valuable. We shouldn't just try to homogenize all stands.

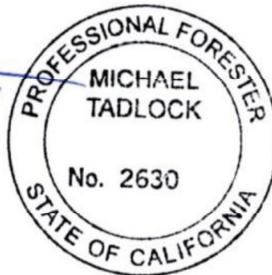
Three responses focused on potential adverse impacts such a prescription could have on other operations. There is a concern that during the development of this prescription there will be a push to create hardwood retention rules. Furthermore, if such a prescription exists there is a fear that projects proposing to reduce hardwood stocking in favor of conifers may meet resistance from environmental groups. In general, the concerns raised intimated that hardwoods are becoming a regulatory burden and such a prescription may just enhance that burden.

The results of this survey suggest that the RPF community would put such a prescription to use. It is important to note that this was a voluntary survey and the number of respondents represents less than 20% of the CLFA membership. Therefore it may be possible that only those RPFs with an interest in this subject responded, skewing the results.

Sincerely,



Michael Tadlock  
RPF #2630  
President



*The California Licensed Foresters Association, with a membership responsible for the sustained management of millions of acres of California forestland, represents the common interests of California Registered Professional Foresters. The Association provides opportunities for continuing education and public outreach to its membership, which includes professionals affiliated with government agencies, private timber companies, consultants, the public, and the academic community. Governed by an elected Board of Directors, CLFA was established in 1980 after the passage of the landmark California Professional Foresters Law.*