



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
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EDMUND G. BROWN JR., Governor  
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May 1, 2015

Members Richard Wade and Michael Miles  
Forest Practice Committee  
California Board of Forestry and Fire Protection  
1416 Ninth Street  
P.O. Box 944246  
Sacramento, CA 94244-2460

Dear Messrs. Wade and Miles:

Subject: **SUPPLEMENTAL RECOMMENDATIONS FOR REVISIONS TO TECHNICAL  
RULE ADDENDUM NO. 2**

California Department of Fish and Wildlife (CDFW) staff has participated in discussions before the Forest Practice Committee (Committee) regarding proposed changes to Technical Rule Addendum No. 2 (TRA#2) of the California Forest Practice Rules. Most recently, the Committee's attention turned to proposed changes to sections 4. (f) and (g) of "C. Biological Resources," which address "Late Seral (Mature) Forest Characteristics" and "Late Seral Habitat Continuity," respectively.

Please find enclosed the pertinent excerpts of TRA#2 with CDFW's proposed revisions indicated. In contrast to CDFW's recommended text changes presented to the Committee on October 13, 2014, CDFW now recommends "late seral" be retained in TRA#2 to clearly distinguish references to it from "late succession forest stands" as defined in the CFPRs. Evaluations of cumulative effects on late seral forest characteristics and late seral habitat continuity include but are by no means limited to effects on late succession forest stands, which are a subset of the broader category of late seral forest characteristics.

CDFW appreciates the opportunity to provide comments and recommendations to the Committee as part of a process to reform TRA#2. Should you have any questions and/or would like to discuss our input, please contact Environmental Program Manager William Condon with the Department's Timberland Conservation Program in the Habitat Conservation Planning Branch, at (916) 651-3110 or by email at [William.condon@wildlife.ca.gov](mailto:William.condon@wildlife.ca.gov).

Sincerely,

Sandra Morey  
Deputy Director  
Ecosystem Conservation Division

Enclosure

**FPC 2.1**

Messrs. Richard Wade and Michael Miles

May 1, 2015

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1 forest types, such as oak woodlands, are recognized as important ecological resources  
2 for fulfilling wildlife needs and sustaining biodiversity. Productivity of ~~deer and other~~many  
3 wildlife species has been directly related to mast crops associated with either dispersed  
4 hardwoods located within conifer dominated forest types or hardwood dominated forest  
5 types. Hardwood cover can be estimated using the basal area per acre provided by  
6 hardwoods of all species. When discussion of hardwood dominated forest types is  
7 warranted, hardwood cover can be estimated in acres or percent of total forested acres.

8 **[Northern and Southern only]:** Post-harvest deciduous oak retention for  
9 the maintenance of habitats for mule deer and other hardwood-associated wildlife shall be  
10 guided by the Joint Policy on Hardwoods between the California Board of Forestry and  
11 California Fish and Game Commission (5/9/94). To sustain wildlife, a diversity of stand  
12 structural and seral conditions, and tree size and age classes of deciduous oaks should  
13 be retained in proportions that are ecologically sustainable. Regeneration and  
14 recruitment of young deciduous oaks should be sufficient over time to replace mortality of  
15 older trees. Deciduous oaks should be present in sufficient quality and quantity, and in  
16 appropriate locations to provide functional habitat elements for hardwood-associated  
17 wildlife.

18 **f. Late Seral (Mature) Forest Characteristics:** Determination of the  
19 presence or absence of mature ~~and over-mature~~ forest stands and /or their structural  
20 characteristics and components provides a basis from which to begin an assessment of  
21 the influence of management on associated wildlife. These characteristics and  
22 components include large trees, occurring as individuals, in clusters or comprising stands,  
23 that contribute to as part of a multilayered canopy, and the presence of large numbers of  
24 snags and downed logs that contribute to an increased level of stand decadence and  
25 structural complexity. The spatial extent of late seral stage forest characteristics

1 ~~amount\_~~ may be evaluated by estimating the percentage of the land base within the  
2 project and the biological assessment area~~s\_ occupied by areas conforming to the~~  
3 ~~following definitions:~~

4 ~~Forests not previously harvested should be at least 80 acres in size to maintain the~~  
5 ~~effects of edge. This acreage is variable based on the degree of similarity in surrounding~~  
6 ~~areas. The area should include a multi-layered canopy, two or more tree species with~~  
7 ~~several large coniferous trees per acre (smaller subdominant trees may be either conifers~~  
8 ~~or hardwoods), large conifer snags, and an abundance of large woody debris.~~

9 ~~Previously harvested forests are in many possible stages of succession and may~~  
10 ~~include remnant patches of late seral stage forest, which generally conform to the~~  
11 ~~definition of unharvested forests but do not meet the acreage criteria.~~

12 **g. Late Seral Habitat Continuity:** ~~The effects of proposed p~~Projects on  
13 the spatial continuity of containing\_ areas ~~meeting the definitions for\_ with~~ late seral stage  
14 forest characteristics must be evaluated ~~for late seral habitat continuity.~~ The  
15 fragmentation or severing of continuity and resultant isolation of areas with late seral  
16 forest characteristics and associated habitats~~s\_ types\_~~ is one of the most significant factors  
17 influencing the sustainability of wildlife populations requiring these characteristics ~~not~~  
18 ~~adapted to edge environments.~~

19 ~~This\_~~ The direct and cumulative effects on late seral habitat continuity fragmentation  
20 may be evaluated by assessing the spatial configuration and estimating the extent  
21 amount\_ of the ~~on-site\_~~ project and the biological assessment area~~s\_~~ occupied by areas  
22 with late seral forest characteristics. The habitat suitability for many species associated  
23 with closed canopy, interior forest environments that include late seral forest  
24 characteristic is lessened in such areas that are small and adjacent to areas with earlier  
25 seral stages. Late seral habitat continuity can be impaired by project activities that

1 increase fragmentation and isolation of areas with late seral forest characteristics from  
2 other such areas, and by activities that increase the extent of edge or boundaries  
3 between these areas and adjacent younger seral stages. ~~stands greater than 80 acres in~~  
4 size ~~(considering t~~ The mitigating influence of adjacent and similar habitat, ~~if applicable)~~  
5 and less than one mile apart\_ or connectivity ed\_ by a corridor of similar habitat can be  
6 considered.

7 **h. Special Habitat Elements:** The loss of a key habitat element may have  
8 a profound effect on a species even though the habitat is otherwise suitable. Each  
9 species may have several key limiting factors to consider. For example, a special need  
10 for some large raptors is large decadent trees/snags with broken tops or other features.  
11 Deer may have habitat with adequate food and cover to support a healthy population size  
12 and composition but dependent on a few critical meadows suitable for fawning success.  
13 These and other key elements may need special protection.

14 **D. Recreational ~~ECREATIONAL~~ Resources ~~ESOURCES~~:**

15 The recreational assessment area is generally the area that includes the logging area  
16 plus 300 feet.

17 To assess recreational cumulative impacts:

18 **1.** Identify the recreational activities involving significant numbers of people  
19 in and within 300 ft. of logging area (e.g., fishing, hunting, hiking, picnicking, camping).

20 **2.** Identify any recreational Special Treatment Areas described in the Board rules  
21 on the plan area or contiguous to the area.

22 **E. Visual ~~ISUAL~~ Resources ~~ESOURCES~~:**

23 The visual assessment area is generally the logging area that is readily visible to  
24 significant numbers of people who are no further than three miles from the timber  
25 operation. To assess visual cumulative effects: