



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Ecosystem Conservation Division  
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May 4, 2016

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BOARD OF FORESTRY AND FIRE PROTECTION

J. Keith Gillless, Ph.D.  
California Board of Forestry and Fire Protection  
Post Office Box 944246  
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Dear Dr. Gillless:

### WHITE AND BLACK OAK WOODLAND MANAGEMENT SPECIAL PRESCRIPTION

The California Department of Fish and Wildlife (CDFW) has reviewed the rule plead for the "White and Black Oak Woodland Management Special Prescription" (Special Prescription) available through an internet link on the April 29, 2016, Notice of Proposed Action issued by the California Board of Forestry and Fire Protection (Board). The Special Prescription is intended to provide an additional special harvesting method under Title 14 California Code of Regulations (14 CCR) § 913.4 [933.4], for conserving and restoring Oregon white oak and California black oak woodlands that are threatened by conifer encroachment. Oak woodlands are an important public trust resource in California, and they include natural communities with their own intrinsic values and provide habitat for a diverse array of wildlife. CDFW offers the following comments for the Board's consideration.

CDFW recommends the Special Prescription include the methods described in the Survey of California Vegetation (SCV, CDFW 2015) as an alternative to the California Wildlife Habitat Relationships database for Registered Professional Foresters (RPFs) to identify Oregon white oak and California black oak woodlands. The SCV was prepared pursuant to Fish and Game Code § 1940 and conforms to the National Vegetation Classification System. It relies on measureable and repeatable criteria to assess stand composition, age, and structure for defining vegetation types (e.g. alliances). This system distinguishes among vegetation types that vary by location, stand structure, and composition.

CDFW proposes relative tree canopy cover be included as an option for RPFs to use when describing oak woodlands. SCV uses relative tree canopy cover to characterize the relative species dominance in a stand. Similar to relative tree canopy cover, the Oak Woodlands Conservation Act (FGC §1360 *et seq.*) and the Aspen, Meadow, and Wet Area Restoration Special Prescription [14 CCR § 913.4 (e) (4), 933.4(e) (4), 953.4 (e) (4)] use "percent canopy cover" and "overstory and understory coverage", respectively. RPFs and land managers could use tree canopy cover of oaks relative to other tree species to devise management objectives and weigh treatment options.

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CDFW recommends the Special Prescription include requirements that the RPF state the project goals and success criteria, as well as monitoring and reporting requirements to analyze the effectiveness of oak woodland management. These could be similar to the requirements under the Aspen, Meadow, and Wet Area Restoration Special Prescription [14 CCR § 913.4, 933.4, 953.4 (e) (5), (7)]. CDFW is available to assist the Board with crafting language for these additional requirements.

CDFW's recommendations for the Special Prescription presented above include measures that should be familiar to RPFs as they already occur elsewhere in the California Forest Practice Rules. These include use of canopy cover as a stand indicator and statements of project goals, success criteria, monitoring and reporting. As such, CDFW believes by adopting these recommendations, the Board would not be adding a level of complexity that RPFs would regard as challenging or burdensome.

CDFW appreciates and supports the Board's efforts to help conserve Oregon white oak and California black oak woodlands, including the promulgation of these Special Prescription rules.

Should you have any questions and/or would like to discuss our recommendations, please contact William Condon, Environmental Program Manager, with CDFW's Timberland Conservation Program in the Habitat Conservation Planning Branch, at (916) 651-3110 or at [William.Condon@wildlife.ca.gov](mailto:William.Condon@wildlife.ca.gov).

Sincerely,



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