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Board of Forestry and Fire Protection  
Attn: Christopher Zimny  
Regulations Coordinator  
P.O. Box 944246  
Sacramento, CA 94244-2460

RE: Transition Silviculture Method 2004

Dear Board Members:

The California Licensed Foresters Association (CLFA) would like to submit the following comments to the record for the consideration and review of the Board of Forestry (BOF) on the proposed rulemaking package titled "Transition Silviculture Method 2004" (proposed package). CLFA has reviewed the proposed package as delineated in the 45-day notice circulated April 9, 2004. CLFA supports the proposed package and submits the following comments for the BOF's consideration for incorporation into the final rule language.

### **Comment 1**

Lines 24 and 25 on page 2 of the proposed package refer to preharvest stocking levels in general. Discussions at the BOF Forest Practices Committee seemed to indicate that this section refers specifically to the seed tree retention levels and not to stocking levels in general. **Recommended text change (underline indicates addition, ~~strikethrough~~ indicates deletion):** (1) Area for determination of preharvest seed tree stocking levels for conformance with subsection (b) above shall be no greater than 20 acres in size.

### **Comment 2**

Lines 19-22 on page 3 of the proposed package appear to require that the stocking requirements of 14 CCR § 912.7(b)(2), [932.7(b)(2), 952.7(b)(2)] only have to be met after the first use of this method. Discussions at the BOF Forest Practices Committee seemed to indicate that this standard should be met for the first use and for all subsequent uses of this method within a stand. In fact, by not specifying a stocking standard for subsequent uses of the method, the stocking standard becomes that of 14 CCR § 912.7(b), [932.7(b), 952.7(b)], which includes the point-count standard. Allowing the reduction of stocking levels to the point-count standard for an entire stand would be counter-productive to the ultimate objective of the Transition Silvicultural method, which is to allow for eventual unevenaged management. **Recommended text change (underline indicates addition, ~~strikethrough~~ indicates deletion):** Immediately following the completion of timber operations on the first use of this method, the minimum basal area standards in 14 CCR § 912.7(b)(2), [932.7(b)(2), 952.7(b)(2)] shall be met.

### **Comment 3**

Page 4, lines 7-9: We recommend a minor grammatical edit to make the rule reference consistent with the rest of the Forest Practice Rules. **Recommended text change (underline indicates addition, strikethrough indicates deletion):** Disease free, undamaged seed trees 18 inches dbh or greater will be retained post harvest until the stand exceeds the minimum seed tree requirements, of 14 CCR § 913.1, [933.1, 953.1](c)(1)(A).

### **Comment 4**

There appears to be an error on lines 15 ½ to 18 ½ on page 6 of the 45-day notice language. There are several words in those lines that should be underlined, as these words are additions to the California Code of Regulations.

### **Comment 5**

The following recommended text changes are proposed to make the rule references more precise and consistent with previous methods used in the proposed rule package. **Recommended text change (underline indicates addition, strikethrough indicates deletion):**

Line 6, page 4: 14 CCR § 913.2;~~(b)(1)~~ [933.2(b)(1), 953.2(b)(1)] ~~(b)(1)~~

Line 9, page 4: 14 CCR § 913.1;~~(c)(1)(A)~~ [933.1(c)(1)(A), 953.1(c)(1)(A)] ~~(c)(1)(A)~~

Line 16, page 6: 14 CCR § 913.1;~~(a)(1)~~ [933.1(a)(1), 953.1(a)(1)] ~~(a)(1)~~

Line 21, page 6: 14 CCR § 913.1;~~(c)(1)(A)~~ [933.1(c)(1)(A), 953.1(c)(1)(A)] ~~(c)(1)(A)~~

Line 22, page 6: 14 CCR § 913.2;~~(b)(6)~~ [933.2(b)(6), 953.2(b)(6)] ~~(b)(6)~~

Please consider these comments on behalf of our members who represent the majority of the professional expertise used to enforce and comply with our State's Forest Practice Regulations.

Very truly yours,

Chris Quirnbach, RPF #2623  
President, CLFA