

Microclimate Rule Petition

California Board of Forestry
P.O. Box 944246
Sacramento, CA 94244 -2460
August 28, 2003

Dear Board Members,

We, the undersigned groups and individuals, encourage the Board of Forestry to adopt the Microclimate Rule now being proposed to you. The Microclimate Rule would substitute 25 years for the present 5 years of age for the trees in the clearcut blocks, and 25 feet for 5 feet of height, before a unit within 300 feet in any direction may be harvested using a clearcut or another even-aged regeneration method. It would not prohibit clearcutting and other forms of even-aged management, but it would moderate them in ways beneficial to the landscape and its ecology.

The effect of the existing rules (913.4 and 913.3) is that one clearcut unit may be butted up against another as soon as the trees in the first unit are five feet tall or five years old. The effect of that (including other provisions of the rule regarding separation, etc.) is that hill slopes above rivers and creeks may be (and often are) peppered with logging units, with the trees in them ranging anywhere from zero to only five years old. But trees are essential to moderate air flow and air temperature, and they cannot do much of that when they're five feet tall or smaller, and none of it when clearcut.

Science now tells us that air temperature is the single most influential element governing water temperature. We cannot influence sun spots and major climate events, so it behooves us to work doubly hard at controlling those elements over which we do have some control. At the same time, we are increasingly seeing new listings, by the EPA and the Boards of Water Quality, of rivers in California for TMDL pollutants -- particularly, of late, we have new listings of temperature impaired rivers: the Gualala and several other rivers have just been added to the State and Federal 303d lists of waters impaired for temperature. We know why this is: too many trees have been and are being removed too quickly from too many hillsides -- trees which would shade and cool the air, which in turn cools the streams below. See, for example, the scientific literature at http://www.rrraul.org/BOF_8_6_03/Microclimate.html.

In addition to cooling air temperatures (vital for amphibians), and consequently, lowering water temperatures below what are often now lethal levels, in favor of our threatened and endangered fish, the Microclimate Rule would also reduce erosion and reduce habitat loss.

With respect to the adequacy of the current FPRs, the State's own independent panel of scientists (Scientific Review Panel) concluded 4 years ago that:

"...the state agreed to organize an independent panel of scientists to undertake a comprehensive review of the California Forest Practice Rules (FPRs), with regard to their adequacy for the protection of salmonid species... The SRP concluded that the FPRs, including their implementation (the "THP process") do not ensure protection of anadromous salmonid populations. " (Source: Report of the Scientific Review Panel, http://resources.ca.gov/SRP_Rept.pdf)

For these and similar reasons, we urge the Board to adopt the Microclimate Rule.

Sincerely,

Signers:

Individuals:

Linda Perkins
Sierra Club

Paul Ehrlich
Bing Professor of Population Studies
Center for Conservation Biology
Stanford University

Anne Ehrlich
Senior Research Fellow, Biology
Stanford University

Terry L. Root
University Faculty -- Senior Fellow and Professor of Biological Sciences, by Courtesy
Center for Environmental Science and Policy
Institute for International Studies, Stanford University

Phil Temko,
Professor Emeritus, Philosophy, ex-President of the Academic Senate, Sonoma State
University

Dr. Vincent G. Mannings
Staff Research Scientist
California Institute of Technology

Toben Dillworth,
Town Hall Coalition

David Gougler
Santa Rosa, CA

Jack Schoop
Santa Rosa, CA

Jesse Auld and Stefanie Como
Santa Rosa, CA

Randall R. Schulz
Mountain View, CA

Don McEnhill
Russian Riverkeeper

Groups:

Helen Libeu,
Citizens for Watershed Protection

Jay Halcomb,
Russian River Residents Against Unsafe Logging (RRRAUL)
<http://www.rrraul.org>

Alan Levine,
Coast Action Group

Chris Poehlmann,
Coastal Forest Alliance

Dave Jordan,
Friends of the Gualala River

Vernoica Jacobi
Forest Coalition

Diane Hichwa
Madrone Audubon Society

Warren Alford
Sierra Club

Dan Wickham, Ph.D.
Friends of the Russian River