

I am Catherine Moore and my husband and I own a small tree farm in the Santa Cruz Mountains. We are certified sustainable through both Tree Farm and FSC. We have found those enacting environmental regulations have a weak grasp at best of the economic impacts of their programs.

We can harvest trees no more frequently than once every ten years. This is a very long crop rotation cycle and we accumulate a lot of expenses between harvests in maintaining our land's road systems and keeping exotics under control. All of these expenses come out of our pockets until we can be reimbursed at harvest time. There's a good deal less profit than you think by the time this is accounted for.

We would like to provide improved habitat on our land for fish and other species, but have found that we are typically punished for our efforts by having to absorb more restrictions on the use of our property. We currently have a Class II stream in our land, one that does not bear fish. If we improve the stream bed to the point where it can bear fish, it becomes a Class I and the no-touch zone around it gets wider and we can harvest even less of the inventory in the areas surrounding the no-touch zone.

Take a look at a aerial map of this area. You will observe that the redwood trees are found chiefly along the stream beds. We lose a significant amount of our highest value inventory each time this wetland protection zone gets widened. This makes no business sense and therefore we are actually being discouraged from improving habitat.

If you want to get private landowners such as ourselves to participate in your salmon restoration activities, we need adjustments to this plan to make it financially viable. We need a Safe Harbor arrangement that allows us to continue to operate at our original levels even after we have improved the habitat areas. You will find a tremendous upsurge of interest in the idea of habitat restoration if you can find a way for landowners to make a profit doing it. You also need to keep in mind that every report we need to submit and every monitoring exercise we need to perform costs us money, money that could be better spent on the ground. If there are too many rules about how it must be done, we will never have any innovation. Thomas Edison said, "There are no rules here; we're trying to accomplish something," when asked about how his laboratory operated. Albert Einstein observed, "It wouldn't be research if we knew what we were doing." We all of us, you and me, need room to maneuver, the ability to make some mistakes in the interest of overall success. Please consider this when formulating your projects. You might consider using the Soquel Demonstration Forest as a testbed before laying requirements on the rest of the area. That's what Demonstration Forests are for.

You have said in your report that the existing regulations have not worked. Why do you think that more regulations will change anything? Have you considered the possibility that you have entirely missed the actual root of the problem?