



mercial fisher who takes specified organisms or a registered aquaculturist, to obtain a marine aquaria receiver's permit from DFG. This bill would delete the requirement that such persons obtain a marine aquaria receiver's permit, and would recast the provision authorizing DFG to establish the fee for that license. This bill would also delete existing law which prohibits taking or possessing specified groups or species of marine plants for commercial purposes. [A. WP&W]

RECENT MEETINGS

At its October 2 meeting, FGC heard arguments by commercial fishers regarding the alleged failure of a five-year-old federal program to save the threatened California sea otter by establishing a colony of otters on San Nicolas Island in Ventura County. Since the program began in 1987, 139 otters have been taken to San Nicolas from the Monterey area in hopes they would thrive in a colony on the remote island. Of those, about half have made their way back to the main colony in the Monterey area. Another eleven have died, and many others are unaccounted for. [11:1 CRLR 122-23; 9:4 CRLR 115-16; 9:3 CRLR 108-09] Wildlife scientists and members of the Sea Otter Recovery Team, a group of experts assembled from across the nation, say recapturing the remaining animals would be difficult and stressful on both otters and the divers needed for recapture. As it stands now, sea otters are found within a 220-mile range along the coastline, from Point Año Nuevo south to Pismo Beach, but most are concentrated off the Monterey County coast.

The commercial fishers complained that when the sea otters leave San Nicolas Island and swim back to places like Morro Bay, they decimate the shellfish population, particularly sea urchins and abalone. The revenue generated by the commercial sea urchin fishery alone is \$80 million annually, sufficient to motivate commercial fishers to ask FGC to do something to control the sea otter population.

James Estes, a fish and wildlife research biologist and member of the recovery team, believes biologists should leave the animals on San Nicolas for the time being and monitor the small colony for growth. However, federal scientists plan to recommend that the 2,000 otters off Monterey be permitted to roam the entire coastline. The commercial fishing industry and FGC have expressed concern that such a change could adversely impact abalone and sea urchin fisheries. Commissioner Albert Taucher, a critic of the sea otter program, commented, "I do not know how to [solve the problem], but I

consider the program a failure and I think everyone involved should come back to the table."

At its October 2 meeting, FGC voted unanimously to reject a proposed experimental longline program that would have permitted commercial fishers to deploy between 30 and 50 miles of monofilament line with thousands of baited hooks to target swordfish and tuna. A spirited debate between commercial longliners and United Anglers, a sport fishers organization, took place as to the impact the longlines would have on other fisheries. United Anglers contended that use of longlines would greatly impact swordfish, shark, and striped marlin fisheries. The two species of major concern to United Anglers are blue shark and striped marlin, which have been allocated by the legislature to recreational anglers. In addition, United Anglers maintained that the sportfishing industry brings into California over \$100 million annually for marlin alone, and there is no evidence of any similar economic benefit from hooking marlin with longlines. United Anglers also argued that only a few commercial boat owners would benefit from the permits, while the great majority of the sport fishers and operators would be adversely affected.

At FGC's November 5 meeting, members of the California Aquaculture Association reported on this developing industry. Aquaculture involves the farming of fish, shellfish, and aquatic plants, supplementing commercial catches to meet market demand. Aquaculture represents a \$30 million statewide industry, although few of the farming operations in California are more than ten years old. Product output is expected to double in the 1990s, providing new business opportunities in both farming and associated networks of supply, processing, distribution, sales, and marketing. DFG has responsibility for industry and species regulation, licensing and tracking farm production data, and producing a reference manual for public use. California's aquaculture success, with DFG playing a leading role, counters a national trend to avoid placing regulatory bodies in a leadership position.

FUTURE MEETINGS

June 17-18 in Bridgeport.

August 5-6 in Crescent City.

BOARD OF FORESTRY

Executive Officer:

Dean Cromwell

(916) 653-8007

The Board of Forestry is a nine-member Board appointed to administer the Z'berg-Nejedly Forest Practice Act (FPA) of 1973, Public Resources Code (PRC) section 4511 *et seq.* The Board, established in PRC section 730 *et seq.*, serves to protect California's timber resources and to promote responsible timber harvesting. The Board adopts the Forest Practice Rules (FPR), codified in Division 1.5, Title 14 of the California Code of Regulations (CCR), and provides the California Department of Forestry and Fire Protection (CDF) with policymaking guidance. Additionally, the Board oversees the administration of California's forest system and wildland fire protection system, sets minimum statewide fire safe standards, and reviews safety elements of county general plans. The Board's current members are:

Public: Terry Barlin Gorton (Chair), Franklin L. "Woody" Barnes (Vice-Chair), Robert Heald, and James W. Culver. At this writing, one public member position is vacant.

Forest Products Industry: Mike A. Anderson, Joseph Russ IV, and Thomas C. Nelson.

Range Livestock Industry: Robert J. Kerstiens.

The FPA requires careful planning of every timber harvesting operation by a registered professional forester (RPF). Before logging operations begin, each logging company must retain an RPF to prepare a timber harvesting plan (THP). Each THP must describe the land upon which work is proposed, silvicultural methods to be applied, erosion controls to be used, and other environmental protections required by the Forest Practice Rules. All THPs must be inspected by a forester on the staff of the Department of Forestry and, where deemed necessary, by experts from the Department of Fish and Game, the regional water quality control boards, other state agencies, and/or local governments as appropriate.

For the purpose of promulgating Forest Practice Rules, the state is divided into three geographic districts—southern, northern, and coastal. In each of these districts, a District Technical Advisory Committee (DTAC) is appointed. The various DTACs consult with the Board in the establishment and revision of district forest practice rules. Each DTAC is in turn required to consult with and evaluate the



recommendations of CDF, federal, state, and local agencies, educational institutions, public interest organizations, and private individuals. DTAC members are appointed by the Board and receive no compensation for their service.

MAJOR PROJECTS

Board Finally Adopts Permanent Rules and Findings to Justify Them. At its October 15-16 meeting, the Board finally adopted permanent amendments to the Forest Practice Rules to replace the October 1991 emergency rules which were struck down by the Sacramento County Superior Court in February 1992. [12:4 CRLR 211-12; 12:2&3 CRLR 241; 12:1 CRLR 169-73] With regard to each set of regulatory amendments, the Board also adopted specific findings regarding its authority to promulgate the rules, the necessity for the rules, and alternatives to the adopted rules which had been considered during the year-long rulemaking process. These findings are required for Office of Administrative Law (OAL) approval; they will also be critical in any litigation filed to challenge the regulations, if they are approved.

• **Silvicultural Methods with a Sustained Yield Objective.** The Board's new silvicultural guidelines include—at long last—a definition of the statutory term “maximum sustained production of high quality timber products,” which—although it is the purported basis of the Board's regulation of timbercutting—has never been defined in the FPR. New regulatory section 913.10 (933.10, 953.10) states that “[t]he goal of Maximum Sustained Production of High Quality Timber Products (MSP) is to restore, enhance and maintain the productivity of timberlands, where feasible.” The section further defines the term “restore the productivity of timberlands” to mean “mitigate the adverse effects of catastrophic events or previous land use activities in order to improve the site capacity to grow for harvest commercial tree species and provide forest values.” The term “enhance the productivity of timberlands” means to act by means such as planting, thinning, stand manipulation, stream channel improvement, or other techniques that will lead to increased tree growth and yield, accumulation of growing stock, and production of associated forest values. The term “maintain productivity of timberlands” means to act by means such as restocking after harvest, provision of erosion control and maintenance, provision of watercourse and lake protection, or other techniques that preserve the current level of growth and the harvest of commercial tree species,

and provide sustainable associated forest values.

The new MSP regulation further provides that “[i]n order to restore, enhance, and maintain productivity, it is necessary, among other things, to protect the soils to ensure that they retain their capacity to produce high quality timber products, enforce stocking standards to ensure continuous growth, and implement regulations which meet the specific requirement of the Forest Practice Act to assure the continuous growing and harvesting of commercial tree species on privately owned timberlands and which provide sufficient management flexibility to encourage landowner investments in timberland consistent with the public interest in improving forest growing stock, structures, and diversified wood quality characteristics.”

The Board's factual findings underlying its adoption of this new definition are reminiscent of its shocking statement justifying the adoption of its October 1991 emergency regulations. [12:1 CRLR 169-70] According to the Board, “[s]tudies for [CDF] reveal that a long-term decline in the supply and abundance of timber products from industrial timberlands has occurred [sic], and is likely to continue for at least the next decade.... Also, the U.S. Forest Service has indicated that the National Forest will be reducing their [sic] historical cut by up to one-half of the historical harvest as a result of wildlife and other environmental concerns. This will also increase the pressure to harvest private lands. Where depletion of late successional forest stands or declining timber inventories [sic] are occurring [sic], it threatens the capability of remaining timber inventory on private lands in California to provide forest related resources such as adequate wildlife habitat and the maximum sustained production of high quality timber products as mandated under the Act.”

In sections 913.1, 933.1, and 953.1, the new silvicultural rules include limitations on the use of “evenaged regeneration methods” (clearcutting). These sections do not prohibit clearcutting (“the Board finds that the mandates of the Act to balance resource utilization with conservation are not achieved by the banning of clearcutting and that evenage management has positive attributes taking into account certain site-specific conditions such as tree species biology and erosion potential”); “[h]owever, the use of evenaged methods such as clearcutting must involve appropriate harvest area limitations, buffer requirements, and reentry timing requirements so as to provide for aesthetic, biological, and sustainable yield considerations.”

In its findings, the Board recognized political realities with regard to clearcutting, noting that “the public has sent a strong message to the forest industry and the public agencies charged with administering or protecting California's forests. That message is that large clearcuts or large accumulations of clearcut areas is not acceptable. The message has been sent in several ways. It has been sent through the filing of at least 50 lawsuits over the last 5 years, with 21 outstanding at this time. An initiative drastically revising forestry institutions was placed on the ballot two years ago and was defeated but had substantial support. Two major legislative efforts have been made in the last two years (Sierra Accord/Grand Accord) to change California Forestry. There have been periodic public demonstrations against either clearcutting specifically or harvesting areas which utilize clearcutting in part.... Finally, it has been made clear to the Board that the mainstream environmental groups intend to place an initiative on the 1994 ballot which will severely restrict if not eliminate the use of clearcutting in California. The Board cannot ignore these facts and must act to maintain the ability of the forestry community to use clearcutting and other evenaged management methods.”

The new silviculture rules also include new Subchapter 7, Article 7, which establishes criteria for the optional submission of a “sustained yield plan” (SYP) by a timber landowner. The Board created the voluntary SYP in response to criticism that its existing THP process is a “project-level” examination rather than a “landscape-level” analysis addressing long-term, significant, cumulative impacts of timbercutting on forest-related resources, as is required by the California Environmental Quality Act (CEQA). The SYP is intended to supplement the THP process, and is designed to address “long-term issues of sustained timber production, cumulative effects analysis which includes issues of fish and wildlife[,] and watershed impacts on [a] large landscape basis.”

SYPs apply to “management units”—for example, planning watersheds or larger areas—up to the size of all of the ownership in one forest district and, once approved, remain in effect for three years. Data upon which a SYP is based must be updated every ten years. In environmental terms, the SYP is to “address threatened, endangered and sensitive species and other fish and wildlife species to [sic] which timber operations could adversely impact....” It must include feasible mitigation measures (as well as “positive” impacts on fish and wildlife) and identify



reasonable mitigation measures considered but rejected as not feasible.

The CDF Director is required to hold a public hearing on a proposed SYP. After the hearing, the Director must review public input and the recommendations and mitigation measures suggested by other public agencies, and respond to them in writing before making a "determination of conformance" with the regulations. Written reasons must be provided for a disapproval only, and appeal procedures would parallel those provided in the FPA for THPs.

• **Sensitive Watersheds.** The Board also adopted new sections 916.8 (936.8, 956.8), 916.9 (936.9, 956.9), 916.10 (936.10, 956.10), and 1032.10, Title 14 of the CCR, creating a public process to assess, identify, and classify those watersheds which warrant classification as "sensitive." The purpose of the "sensitive" classification is to ensure that such watersheds are identified to the state and individuals within those watersheds who plan future timber operations, and that appropriate mitigation measures are taken to avoid or reduce to insignificance potential significant adverse impacts.

The new rules create a nomination process whereby the CDF Director, local, state or federal agencies, or members of the public may nominate planning watersheds to the Board for "sensitive" classification; the nominator must provide evidence supporting classification of the watershed as "sensitive." Following notice to affected parties and screening by a "nominations review committee," the Board must make "sensitive" classification determinations at a public hearing, and they must be supported by "substantial evidence that a condition, or conditions, exist(s) where further timber operations within the planning watershed will create a reasonable potential to cause, or contribute to ongoing, significant adverse cumulative effect(s) on...[specified forest resources], and that mitigation of such significant cumulative effects requires the application of protection measures not required by the Forest Practice Rules." The new section also states that a Board finding that a watershed is no longer sensitive must also be supported by substantial evidence that the conditions making the watershed sensitive no longer exist. Finally, the new rules set forth protections for domestic water supplies, require a THP submitter whose THP may affect domestic water supply from a watercourse to notify all landowners within 1,000 feet downstream of the THP boundary of the proposed timbercutting, and require the CDF Director to provide the Board with a report

on the implementation of these rules in December 1994.

• **Old-Growth Forest, Late-Seral Stage Forest, and Wildlife Protection Regulations.** On September 25, the Board published language containing two options for protecting "late successional" forest stands and the wildlife which resides in these stands. [12:4 CRLR 211] During its October 15-16 meeting, the Board combined the two options and adopted the language as modified. Language taken from Option #2 includes an amendment to section 895.1, Title 14 of the CCR, to define the term "late successional forest stands" as "stands of dominant and predominant trees that meet the criteria of WHR [wildlife habitat relationships] class 5M, 5D, or 6 with an open, moderate, or dense canopy closure classification, often with multiple canopy layers, and are at least 20 acres in size. Functional characteristics of late successional forests include large decadent trees, snags, and large down logs." The section also defines the term "long-term significant adverse effect on fish, wildlife, or listed species known to be associated with late successional forest stands" as "an effect that creates an identifiable trend or set of conditions which provide a reasonable conclusion that a population of one or more species of fish, wildlife, or listed species primarily associated with late successional forests stands will become extirpated from a significant portion of its current range in the Forest District within the planning horizon."

New section 919.16(a) (939.16(a), 959.16(a)), Title 14 of the CCR, requires the RPF to provide habitat structure information to CDF whenever late successional forest stands are proposed for harvesting and such harvesting will significantly reduce the amount and distribution of late successional forest stands or their functional habitat. The report prepared by the RPF must include but is not limited to (a) a map showing the stand within the planning watershed and any other stands that provide functional wildlife habitat for late succession wildlife within the ownership; (b) a list of fish, wildlife, and listed species known to be primarily associated with the late successional forest stand; (c) a description of the habitat elements that are important for the wildlife listed in (b) above; (d) a description of the habitat objectives, such as anticipated long-term landscape patterns, stand structures for late successional forest stands, and a discussion of anticipated recruitment procedures for important habitat elements; and (e) an analysis of the long-term significant adverse effects on late successional stand wildlife. Section 919.16(b) requires that

where timber operations will result in long-term significant adverse effects on late successional stand wildlife in a THP, SYP, nonindustrial timber management plan (NTMP), or planning watershed, feasible mitigation measures to mitigate or avoid such long-term significant effects must be described and incorporated in the THP, SYP, or NTMP. Section 919.16(c) allows a THP, SYP, or NTMP submitter to request that the CDF Director waive subsection (a). The Director may waive the subsection if substantial evidence is presented that would support a determination that the post-harvest late successional forest stand or functional wildlife habitat will continue to provide adequate habitat for late successional wildlife.

In the final analysis, the Board bases its authority for the adoption of the new permanent rules on the FPA, CEQA, and the public trust doctrine. CEQA provides that no state agency may approve a project that will potentially have a significant adverse effect on the environment unless the potential effects have been assessed and all feasible mitigation measures are included to substantially reduce or avoid such effects; the CEQA mandate is usually met by the preparation of an environmental impact report (EIR). The Board asserts that its THP process and associated regulations are functionally equivalent to the CEQA EIR process. This assertion, however, is currently under challenge in *Redwood Coast Watershed Alliance v. California State Board of Forestry, et al.*, No. 932123 (San Francisco Superior Court). [See *infra* LITIGATION; 12:4 CRLR 214; 12:1 CRLR 176]

Not everyone was happy with the Board's effort. In the November 13 issue of its *Legislative Agenda* newsletter, the Sierra Club termed the Board's new rules "a farce," and characterized the Board's year-long rulemaking process as "a colossal waste of collective time and resources." The environmental organization stated that the regulations indicate the Board "has abandoned their [sic] commitment to forestry reform in favor of essentially industry-developed rule packages that will bring no real change in industrial forestry practices in California....In fact, it was clear, in terms of the silviculture package, the Board of Forestry wanted to turn back the clock to pre-1973 conditions when the timber industry regulated itself through representation on the Board." The newsletter reported that language is being developed for a number of forest protection bills which will be introduced in the 1993-94 legislative session.

At this writing, none of these regulatory packages has been submitted to OAL



for approval.

Proposed Notification of Exempt Timber Operations in Santa Cruz County That Local Rules May Apply Where State Regulations Do Not. On November 20, the Board published notice of its intent to adopt new section 926.21, Title 14 of the CCR, under which the CDF Director will not issue a notice of exemption to timber operations conducted on Santa Cruz County ownerships of less than three acres in size until the Director has notified the County of the proposed timbercutting and the County has an opportunity to determine whether the plan conforms to its local ordinances.

The proposed rule would delay timber operations for up to fifteen days from submission of the notice of exemption until the Director supplies written notice of acceptance or rejection. During the fifteen-day review period, the Director would obtain comments on the proposal from the Santa Cruz County Planning Director. CDF's notice of acceptance would include notification that the County also has regulatory authority, that the acceptance applies only to state compliance, and, if applicable, that Santa Cruz County officials have informed the Director that local ordinances may apply and the submitter should consult with the County.

At this writing, the Board is scheduled to conduct a January 5 public hearing on this proposed regulatory change.

Proposed Biomass Harvesting of Dead Timber on Substantially Damaged Timberland. On December 18, the Board published notice of its intent to amend section 1038(b), Title 14 of the CCR, to provide for biomass harvesting of dead timber on substantially damaged timberland.

Under the current Forest Practice Rules, a timberland owner may file an emergency notice with the CDF Director in order to remove dead or dying trees following a wildfire on the property. The emergency notice exemption allows the landowner to promptly remove the dead or dying timber from the damaged area and reduce the amount of loss and waste of timber resources. The landowner has 60 days to remove dead or dying timber, and is restricted to removal of less than 10% of the average volume per acre. As a result of these restrictions, timberland owners usually only remove the larger and more valuable sawlog-sized trees while small-sized trees are left on the site. In order to remove any timber in excess of the 10% maximum or beyond the 60-day time period, the landowner must go through the normal THP process, which normally takes one to two years. By the time the THP has been approved, the value of the remaining dead

timber is greatly diminished or completely lost.

Under the amendments proposed by the Board, timberland owners will be able to remove all dead timber from wildfire sites measuring less than eleven inches diameter at breast height (dbh). Landowners will still be restricted to harvesting no more than 10% of all trees over eleven inches dbh. These amendments will enable timberland owners to better prepare burned areas for future harvest and to receive some economic value for the smaller burned trees.

At this writing, the Board is scheduled to hold a February 2 public hearing on these proposed regulatory changes.

Board to Impose Restrictions on Firearms. On November 20, the Board published notice of its intent to impose restrictions on firearms in certain forests for safety and security reasons. Specifically, the Board seeks to amend section 1437, Title 14 of the CCR, to prohibit firearm discharge (except for wildlife management purposes) at Boggs Mountain Demonstration State Forest in Lake County and Sequel Demonstration State Forest in Santa Cruz County. Firearms must be taken apart or encased in these two forests. The prohibition has been proposed due to numerous incidents of destruction to state property and damage to research plots. At this writing, the Board is scheduled to hold a January 5 public hearing on this proposed regulatory change.

Board Declines to Adopt Emergency Rules Protecting Pacific Yew. On December 2, the Board held a public hearing on proposed emergency regulations to implement AB 3756 (Sher) (Chapter 756, Statutes of 1992), which was signed by the Governor on September 17. [12:4 CRLR 213] The bill requires all THP or NTMP submitters to include a description of the known locations of any stands of the Pacific yew larger than a specified size. The Board convened the hearing at the request of the legislature and discussed whether to add new sections to Title 14 of the CCR on an emergency basis in order to further the legislature's intent.

The Pacific yew had previously been known in California as a "trash tree" until scientists discovered that taxol, a chemical produced from the bark of the tree, has powerful cancer-fighting qualities. [11:1 CRLR 28-29] The process of removing the bark kills the tree, and very few Pacific yew are left in California. Fortunately, researchers at Stanford University recently announced that they have developed a process to synthetically manufacture taxol in the laboratory. Bark from the Pacific yew is currently sold at 40 cents

per pound and is not a large source of income for the timber industry.

Members of the Board questioned whether an emergency really exists to warrant the adoption of emergency regulations. After discussion, the Board decided that the only reason an "emergency" might exist is the legislature's declaration that an emergency exists. The Board concluded that sufficient reason to adopt emergency regulations did not exist, and the hearing was closed.

At this writing, the Board is scheduled to open a new hearing on its proposed Pacific yew regulations on January 5; after January 1, it will be acting under the authority of AB 3756.

LEGISLATION

AB 48 (Sher). The FPA provides that no person may conduct timber operations on timberland unless a THP has been prepared and submitted to CDF and approved by the CDF Director or the Board. As introduced December 15, this bill would prohibit the commencement of timber harvesting operations until 20 days after approval of the THP. [A. NatRes]

AB 49 (Sher), as introduced December 15, would require the Board to prescribe training and testing procedures to be conducted by CDF for new timber operator license applicants; establish a schedule of filing fees for licenses sufficient to recover CDF's costs in administering the license program; and establish a schedule of fees for new licenses to cover CDF's costs in administering the training and testing program. [A. NatRes]

LITIGATION

The California Supreme Court has granted petitions for review in both *Public Resources Protection Association of California v. California Department of Forestry and Fire Protection*, No. A047871 (Mar. 5, 1992), and *Sierra Club v. California Board of Forestry (Pacific Lumber Company, Real Party in Interest)*, No. A047924 (Mar. 18, 1992). [12:4 CRLR 214] A date for oral argument has not been set in either case.

Redwood Coast Watershed Alliance v. California State Board of Forestry, et al., No. 932123 (San Francisco Superior Court), is still under submission. In this case, RCWA alleges that the Board and CDF's regulation of timber operations on private land violates certain requirements of CEQA, and that the THP process administered by CDF and the Board is not functionally equivalent to the environmental impact report process required by CEQA. [12:4 CRLR 214; 12:1 CRLR 176]



RECENT MEETINGS

At its December meeting, the Board discussed a draft habitat conservation plan regarding the northern and California spotted owls. The report had been requested from the U.S. Forest Service (USFS) by an advisory committee of state Resources Agency officials responsible to Governor Wilson. Although the final report was not scheduled for release until January, USFS had released its conclusion that female breeder owls are declining much more rapidly than previous reports have indicated. The draft plan also calls for more future research and will recommend that more private land in old-growth stands be set aside for endangered species habitat. The plan will propose that additional funding for this habitat be raised through a new lumber transaction fee that will be levied on the plywood and grading industries.

The report was initially requested by the advisory committee after *Seattle Audubon Society, et al. v. James R. Moseley, et al.*, 798 F. Supp. 1473 (1991), was decided in federal district court. [12:1 CRLR 175] In *Seattle Audubon Society*, Judge William Dwyer held that USFS' failure to prepare a forest management plan to preserve the owl, which had been listed as endangered, violated the National Environmental Policy Act (NEPA). In the decision, Judge Dwyer issued a two-part injunction against USFS. The first part of the injunction directed USFS to prepare a new or supplemental environmental impact statement in compliance with NEPA. The second part of the injunction enjoined USFS from auctioning or awarding additional timber sales in the Pacific Northwest region that could provide habitat for the northern spotted owl until revised standards and guidelines in compliance with the governing statutes are adopted and in effect.

Forest products industry Board member Thomas Nelson urged the USFS representative not to release the report at this time, because more research should be done regarding its findings. Nelson also argued that USFS should prepare several alternatives in the habitat conservation plan. Following discussion, the Board voted to recommend that USFS withhold the report until more research regarding the viability of the northern spotted owl is conducted; in addition, the Board requested that more than one compliance option be prepared by USFS. The Board also urged that if USFS decides to publish the report as is, the report be labeled a preliminary draft pending further research and analysis. Representatives of the Sierra

Club voiced strong objection to this request by the Board, and threatened future litigation if the Board succeeds in suppressing USFS' report. At this writing, USFS plans to release its report in mid-January.

FUTURE MEETINGS

June 8-9 in Redding.
July 6-7 in San Diego.
August 3-4 in Eureka.