



November 5, 2014

Mr. J. Keith Gillless, Chair
State Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

Dear Chairman Gillless & Board:

Roseburg Forest Products' veneer mill in Weed California was recently burned over, along with the City of Weed in the Boles Fire of September 15, 2014. About 150 structures were lost, but our mill was only damaged, and has since resumed production on a limited basis. A declared State Disaster Area, most of the destroyed homes have been cleaned up, leaving vacant black lots. The only notable features are the large burned trees remaining. Attached figures 1-3 provide a before-and-after depiction.

I was approached by a Calfire employee who inquired about Roseburg's ability to harvest or accept logs from the now-vacant house parcels in town. Inquiry by Calfire Resource staff regarding what type of paperwork or permits that would be required produced some truly interesting solutions.

One alternative that was quickly discarded was a 1038(c) Exemption which allows trees to be cut that are within 150-feet of a legal structure to "reduce fire spread, duration and intensity", because the requisite structures are now gone. Ironically the trees would have been difficult to fall while the houses were still there. I guess we could rebuild the homes and then cut the trees?

The final word from Sacramento Headquarters I'm told, was that a RM-67 Emergency Notice must be submitted for every lot, regardless size. This is because any lot even with a single tree is considered "capable of and available for" timber production.

Roseburg will continue to assist the cleanup to the extent possible, even if it means placing an RPF license on 100+ Emergency Notices. I provide this information so you will consider some of the paradoxical regulatory interpretations that defy common sense.

Sincerely,


Arne Hultgren
California Resource Manager



Figure 1 (Dec. 19, 2006)

Figure 2 (Nov. 4, 2014)





Figure 3 (Nov. 4, 2014)