



February 25, 2014

Mr. Mark Andre
Chair
Forest Practice Committee
California Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

Dear Mr. Andre:

**RE: “Slash Burning” Proposal Before Forest Practice Committee, March 2014--
SUPPORT**

Our association of largely family-owned, multi-generational loggers, log truckers, and log road builders respectfully submits the following comments on the above-referenced topic.

In follow-up to our testimony at the January 2014 meeting of the Forest Practice Committee (“FPC”) of the Board of Forestry and Fire Protection (“Board of Forestry”), Associated California Loggers (“ACL”) would like to go officially on record in SUPPORT of the “Slash Burning” proposal as offered to the FPC at the January meeting, by the California Licensed Foresters Association (“CLFA.”)

We have canvassed our members and have learned that there is significant concern – particularly in the heavy drought years of 2013 and likely 2014 – that slash pile burning requirements reflect this climactic condition and that LTOs be allowed to wait longer than April 1 of the year following the creation of a slash pile to burn it.

For us, the issue boils down to “the slash material being dry enough to burn, at such time as climactic conditions are safe for burning,” and that has not been the case before April 1 in many recent years.

ACL sees this as the proposal of CLFA to advance, but as mechanical logging techniques and the slash piles generated are part of the CLFA support letter discussion, we would be remiss in not offering our opinions from “the Licensed Timber Operator perspective”.

This is a good time to remind the FPC that mechanical logging has provided real advances in timber harvesting techniques. Mechanical logging is less physically stressful and dangerous to the fallers and other crew members performing harvest; safety is a major concern in our sector of the timber industry.

Mechanical harvesting has also proven to help make sure that harvesting occurs with precision and with environmental concerns addressed (although, given California’s environmental

regulations, hand falling techniques are undertaken with a similar commitment.) And yes, as a matter of providing work in the depressed rural timber communities of our state, mechanical logging provides for a greater accumulation of marketable timber and (from a fire prevention standpoint) a greater ability to move quickly on clearing the woods of fuels.

For all these reasons, addressing the slash piles created by mechanical logging is a task that the FPC should welcome.

Associated California Loggers urges the Forest Practice Committee to advance this proposal to the full Board of Forestry for adoption as a regulation in 2014.

Sincerely,



ERIC CARLESON
Executive Director
Associated California Loggers