



CALIFORNIA  
LICENSED  
FORESTERS  
ASSOCIATION

P.O. Box 1516 · Pioneer, CA 95666  
phone · 209.293.7323 fax · 209.293.7544  
email · [clfa@volcano.net](mailto:clfa@volcano.net) web · [www.clfa.org](http://www.clfa.org)

November 6, 2007

Mr. Stan Dixon, Chairman  
California Board of Forestry and Fire Protection  
P.O. Box 944246  
Sacramento, CA 94244-2460

**Re: Lead Agency Regulatory Enforcement.**

Dear Chairman Dixon,

Since the inception of the California Forest Practice Rules, forest landowners and Registered Professional Foresters have been subject to the flow of regulatory interpretation. Over the course of the past year the California Licensed Foresters Association has received comments and reports on varying aspects of the review process. The following information is provided as a general basis for discussions of these items.

As lead agency for the Timber Harvest Plan review process, CalFire is tasked with ensuring that the required procedures and regulations are followed. They are also charged with providing the check to prevent unnecessary recommendations from encroaching upon the harvest permitting process. The regulatory process is currently cluttered with interagency overlap, and CDF appears to experience difficulty in attaining the above objectives.

- ◆ CLFA is requesting that the Board direct CalFire to uphold its role as lead agency in the timber harvest review process.

The timeline for timber harvest review has been treated with increasing disregard. The schedules were set in statute to provide the project proponents with some assurance that the review process would not be overly burdensome to landowners. Unfortunately, adherence to the timeline has become the exception in a process wrought with delays and multiple inspections. It is typical for a Pre-Harvest Inspection to be scheduled 30 days from the filing date of a project and to require multiple inspections. Further delays in inspection reports, often exceeding a month after the pre-harvest inspection, only exacerbate the problem.

- ◆ CLFA encourages the Board to provide direction to CalFire as how to operate within the mandated timelines.

CalFire consistently defers to other State and Federal agencies on issues regarding wildlife, fish, watercourse classification, crossing design, and botany. In many instances these agencies provide valuable guidance in the protection of California's native plant and animal species in accordance with their legally mandated policies. However, the Forest Practice Rules incorporate measures designed to provide ample protection for Board listed sensitive species

and assurance to landowners of what buffers to anticipate. Species not listed by the Board or through Federal and State Endangered Species Acts, are not significantly impacted by timber harvesting and often require no additional protection.

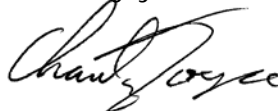
- ◆ CLFA requests that the Board instruct the Department of when to rely on the Forest Practice Rules, and when to defer to the trustee agencies for consultation.

Recent revisions by the California Department of Fish and Game to the procedures to determine wildlife habitat types have raised concerns. The new process seems contrary to the process widely accepted throughout the state and does not appear to have been peer reviewed by the public.

- ◆ CLFA asks the board to clarify to CalFire how to consider and implement any imposed redefinitions of generally accepted terms and practices.

The California Licensed Foresters Association has brought these issues before the Board to illustrate some of the current concerns facing timberland managers. We look forward to working with the Board of Forestry and CalFire on these matters, and are optimistic that their resolution will result in a more efficient and effective review process.

Sincerely yours,



Chantz Joyce, RPF #2753  
President

Cc: Mr. Ruben Grijalva, Director, CAL FIRE.  
Mr. William Snyder, Deputy Director, Resources, CAL FIRE.  
Mr. Crawford Tuttle, Chief Deputy Director, CAL FIRE.  
Mr. Mike Chrisman, Secretary, Resources Agency.  
CLFA Board of Directors.

*The California Licensed Foresters Association, with a membership responsible for the sustained management of millions of acres of California forestland, represents the common interests of California Registered Professional Foresters. The Association provides opportunities for continuing education and public outreach to its membership, which includes professionals affiliated with government agencies, private timber companies, consultants, the public, and the academic community. Governed by an elected Board of Directors, CLFA was established in 1980 after the passage of the landmark California Professional Foresters Law.*