Board of Forestry and Fire Protection Staff Report DRAFT Problem Statement for:

Tethered Equipment Operations Utilization within the Forest Practice Rules

At their August 2019 meeting, the Forest Practice Committee initiated discussions surrounding the utilization of tethered logging equipment under existing Forest Practice Rules (Rules) related to tractor and cable operations. Those, and subsequent discussions, provided insight into both the capabilities of modern tethered logging equipment, as well as their limitations under existing Rules. The material considered by the committee to this point has included draft regulatory text, input from various stakeholders including practitioners of tethered logging and project proponents where the practice has been implemented, and presentations from Miller Timber Services and Campbell Global on the capabilities and impacts of such equipment.

From the input received by the Forest Practice and full Board Joint Committees, it would appear that the existing regulations related to tractor and cable operations may be outdated. These out-of-date rules do not promote the appropriate use of modern, tethered logging equipment, which may result in less environmental impact than traditional tractor or cable operations. As a result of this input, the following problem statements have been developed regarding the use of tethered logging equipment in the context of existing Rules:

- Existing language within the Rule sections related to tractor and cablebased operations is outdated and does not reflect modern logging practices.
- 2. The limitations on tractor operations within units which are designated for cable operations restrict tractor operations in areas where little to no environmental impact is likely to occur.
- 3. Existing Rules related to tractor and cable operations within 14 CCR §§ 914.2 [934.2, 954.2] and 914.3 [934.3, 954.3] do not fully accommodate the appropriate use of synchronized tethered logging equipment on steep slopes, which may have less environmental impact than traditional cable-based operations.