



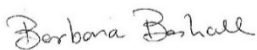
*Example: A subdivision under construction was required to do a timber harvest plan even though there was no timber species on the property. The reason given was because the soil was capable of growing timber. What was the benefit to protect natural resources from logging activity?*

In all these examples, the important goal of resource protection is not applicable but the onerous burden of the Less than 3-Acre Conversion Exemption and Timber Harvest Plan process are applied to the detriment of our communities. In response to the 2021 Regulations and Priority Review request for comments, we have several suggestions for how the regulatory process could be improved without impact to the regulatory intent of resource conservation.

- Amend the definition of "Crop of Trees" to omit properties of less than 3-acres in incorporated or urban areas. It is not realistic to require a conversion exemption on these properties when they are not large enough for commercial timber operations to occur.
- Where the 3-Acre Conversion is still applicable, revise the expiration period as one year is often insufficient to complete work.
- Instead of an exemption process, revise the PRC and practices so that applicants are not required to spend significant time and money filling out an exemption request that ends up being approved administratively. It is unnecessary and provides no value to require a Registered Professional Forester and Licensed Timber Operator to fill out the exemption form.
- Simplify the Timber Harvest Permit, conversion and exemption processes and improve the applications and available information.
- Better educate jurisdictions and the development industry on requirements.
- Expand the definition of "site preparation" to include local jurisdiction approved projects of less than 3 acres where there is no timber operation or commercial use for the timber as the one-time conversion process is too onerous and costly.

We request that the Board of Forestry direct staff to work with our respective organizations at the committee level on recommendations to improve the regulatory process. We are certain that significant improvements can be made to the regulatory process which would not jeopardize the resource conservation intent of the code.

Sincerely,



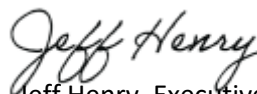
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