



CALIFORNIA
LICENSED
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June 23, 2014

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

RE: Slash Treatment Amendments, 2014.

Dear Chairman Gillless and Board Members,

CLFA supports the amendments to provide greater flexibility in treatment of logging slash.

The benefits of piling logging slash for burning are many including reduced overall fuel load, enhanced natural regeneration potential, reduction of organic surface material loss, and reduction of fire escape risk as compared to other methods of treating slash by burning.

Current regulations pose the same restrictions on timing of treatment by piling and burning regardless of when that material is piled. As currently written 14 CCR 917.2(a) [937.2(a), 957.2(a)] requires that slash to be treated by piling and burning shall be treated not later than April 1 of the year following its creation, or within 30 days following climatic access regardless of when that slash is piled for burning unless otherwise justified in the plan. This poses significant hardship on landowners, foresters and timber operators when operations occur late in the season.

In order for combustion of piled material to occur such that air quality requirements can be satisfied it must be allowed sufficient time to dry. Additionally, piled material must be consumed sufficiently so as to meet the intent of achieving treated piles. Piles not sufficiently consumed to meet that intent must be treated further. This usually means spreading the material out across the adjacent landscape which is costly, unsafe for equipment operators and does nothing for reducing overall fire hazard.

Piles created late in the season are often too green and/or wet to meet the above mentioned concerns. The proposed rule amendment allowing for piles created after September 1 to be treated not later than May 1 of the second year following its creation will allow landowners, foresters and timber operators much needed flexibility in utilizing this very valuable tool for the treatment of logging slash.

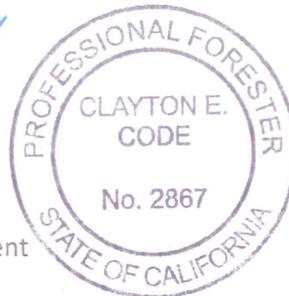
CLFA supports making these modifications to the rules to improve the flexibility for treatment of slash to reduce fire hazard. The treatment of slash in a timely fashion helps to reduce potential catastrophic fires. However, burning slash at an inappropriate time due to prescriptive constraints can lead to increased risk of fire escapes. CLFA believes that increasing the flexibility for slash treatment will help to protect local communities while maintaining feasible timber operations and supporting the economy of the state.

We thank you and the entire board for the time and attention you have placed on this issue.

Sincerely,



Clayton E Code
RPF #2867
CLFA Vice President



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.