

January 13, 2014

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

Re: Calforests additional comments: "Road Rules, 2013"

Dear Chairman Gilles and Board Members,

The California Forestry Association (Calforests) has commented twice previously on the above-referenced Road Rules package. In our first comment letter, dated October 7, 2013, Calforests expressed specific concerns on various technical elements of the rule package. In addition, we urged the Board of Forestry (Board) to prepare a full economic analysis on this rule package, as the potential regulatory and economic consequences of this package will likely be significant. When this rule package was re-noticed in October 2013, Calforests submitted a second comment letter, dated November 7, 2013. The sole purpose of this comment letter was to highlight the lack of a thorough economic analysis for this rule package. Although some cost elements were contained in the published "Final Statement of Reasons" (published by the Board on November 4, 2013), no total cost estimates for any of the significant provisions of this rule package were prepared.

With the Board now re-noticing this rule package for an additional 15 days, we want to take this opportunity to formally reiterate our major concerns with the lack of any meaningful economic analysis for this rule package. As previously stated, this rule package contains various significant revisions to existing road rules, including additional requirements for hydrologic disconnection, changes to winter operating plans, restrictions on road construction and reconstruction in proximity to watercourses, and detailed evaluations of significant erosion sites. These requirements have resulted in new terms, new definitions, new mapping requirements, and other changes to the Timber Harvesting Plan (THP) preparation and review procedures. These changes will result in huge, additional expenditures by forest landowners on their road networks. This potential cost was disclosed—but never discussed or vetted—in the previous "Final Statement of Reasons." Without any full supporting economic analysis to carefully quantify, assess and evaluate these potential significant costs, the economic impacts to the regulated community—in this case, the private forest landowners of California—will likely go unnoticed by the Board during their adoption hearings.

For this reason, Calforests once again urges the Board to carefully assess the potential significant impacts from this proposed rule package on the 13.2 million acres of California's private forest landowners. This can only be done by the preparation of a comprehensive

economic analysis. This economic analysis would contain the elements set forth by California Department of Finance regulations adopted in 2013 that were pursuant to requirements mandated by the passage of SB 617 in 2011. Calforests believes this analysis needs to be completed and released for public review before the Board adopts this rule package.

Thank you for the opportunity to once again comment on this very important matter.

Sincerely,

A handwritten signature in blue ink that reads "David A. Bischel". The signature is fluid and cursive, with the first name "David" being the most prominent part.

David A. Bischel  
President