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January 24, 2014

George Gentry
Executive Officer
Board of Forestry & Fire Protection
PO Box 944246
Sacramento CA 94244-2460

RE: Slash Treatment Proposed Language

Dear Mr. Gentry

With advances in logging equipment technology, mechanical whole-tree logging is greatly increasing in popularity with fewer and fewer logging contractors employing conventional logging systems. Consequently, submerchantable tops and limbwood that would have otherwise been left distributed through harvest units accumulates as landing piles in the landing sites. This material piled in the landing(s) may be chipped for hogfuel or burned in place if chipping is uneconomical or inaccessible for chipping operation equipment.

The choice of mechanical logging whole-tree logging provides numerous benefits with regard to resource protection. Reduced overall fuel load, reduced dispersal of brood material, enhanced natural regeneration potential, reduction of soil disturbance, reduction of organic surface material loss, and reduction of fire escape risk with clean loader-generated slash piles adjacent to roads are but a few of the benefits of this logging method.

The drawbacks to burning landing piles are mostly shared by any method using burning as a tool to reduce fuel loads created by logging slash. Weather conditions must be reached that desired consumption is attained while minimizing the risk of escape, smoke issues when working in proximity to urban interfaces, permissive burn days and length of time the slash material has had to dry. The length of time the slash material has had to dry is the central point of our proposal. Logging slash piled very late in the season maintains high moisture content until late in the following spring, and therefore should be considered no greater fire risk in the coming year than slash piled that spring. 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. This requirement can make treatment of piles created late in the logging season by burning an unviable option. An extreme example to illustrate this is a pile that is created December 31st would have to be treated within 4 months, this may not provide enough time for the slash to dry and offers a very narrow window of opportunity for permissive burn days coupled with favorable weather forecasts to ignite the piles. Alternatively, if a pile were created on January 1st there would be 1 year and 4 months to burn the pile.

Logging slash piled very late in the season should be considered no greater fire risk in the coming year than slash piled that spring. Therefore, for treatment of these piles by burning to be a viable option the deadline for treating these piles needs to be changed.

Please find the attached language for consideration by the Board. Thank you for your time on this matter.



Michael Tadlock
RPF #2630
CLFA President

