



CALIFORNIA
LICENSED
FORESTERS
ASSOCIATION

P.O. Box 1516 · Pioneer, CA 95666
phone · 209.293.7323 fax · 209.293.7544
email · clfa@volcano.net web · www.clfa.org

March 20, 2009

Mr. Stan Dixon, Chairman, and Members
California Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

Reference: 14 CCR 1052 Emergency Notice

Dear Chairman Dixon and Members,

As a professional association representing California's Registered Professional Foresters, we are submitting this letter on behalf of the many forest landowners whose property recently burned from the June 2008 lightning strikes, and the registered professional foresters working to assist these landowners in recouping the losses suffered to their forest assets. We encourage the Board of Forestry and Fire Protection **Management Committee** to take this opportunity to look at improving emergency notices as outlined in 14 CCR 1052 and as identified in the 2009 Committee Priorities Report.

Previous rule modifications extended the emergency notice timeline from 60-days to 120-days as a result of the 1992 Fountain Fire in Shasta County. The notice period was protracted because this event demonstrated that a THP could not be reviewed and approved within a 60-day time period. The original intent of the timeframe was to allow adequate time for an RPF to prepare a THP, while providing an opportunity to begin salvage operations and minimize the loss in value to the landowner.

Presently the 120-day time period is ineffective for large scale events and professional foresters *need* an additional tool to address these incidents effectually. Often, areas impacted by the emergency are left untreated due to operational restrictions, unforeseen complications and even changes in weather conditions during such a short timeframe.

CLFA requests and supports the Management Committee's consideration of an extension of the emergency notice timeline. This would eliminate duplicative and unnecessary paperwork, allowing more time for supervision of field operations focusing on identifying resources at risk.

In California, wildfires often occur late in the year and require significant field work to prepare and meet the operational requirements of the Forest Practice Act and rules. A THP cannot be prepared, filed and approved in the current timeframe to allow continuous fire salvage operations.

Emergency conditions dictate that *time is of the essence* given the economic viability of the damaged timber and the necessity to address additional site specific areas within the fire that may incur additional damage as the result of winter weather conditions. Given the enormous amount of timberland acres that recently burned, there is no doubt that it will take at least one (1) year to complete salvage harvest operations, which will likely include treatment of biomass, site preparation and erosion stabilization efforts.

As large landscape wildfires impact California's forests annually, landowners and land managers must be afforded additional flexibility and time to salvage their timber and rehabilitate their property. The RPF and landowners need either a longer notice period or another permitting option to have ample time to conduct emergency salvage and recovery operations, given factors such as the availability of Licensed Timber Operators, market conditions for sawlogs and/or biomass, and the need to coordinate operations on active THPs prior to their expiration. Extending the emergency notice timeline will help offset the losses incurred by the landowner and provide more efficient opportunities to take action.

Thank you for your consideration of CLFA's views on this important forest policy and management issue.

Sincerely yours,



Charll K. Stoneman, RPF #2375
President

cc: CLFA Board of Directors

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.