Date: 6 November 2007

To: CA Board of Forestry and Fire Protection, Policy Committee

Re: Policy Committee’s request for comments on Forest Practices Rules (FPR)

The committee has requested comments on the implementation and effectiveness of FPRs, specifically the following:

1. Areas where questions exist on interpretation of the regulatory standards, including potential solutions.
2. Issues encountered in achieving compliance with the regulatory standard of rules, including potential solutions.
3. Suggested regulatory modifications which would either 1) clarify existing rule language to better achieve the intended resource protection, or 2) which would reduce regulatory inefficiencies and maintain the same or better level of protection.

I would like to call to the committee’s attention problems with the interpretation of the designation of watercourses, which has caused a chronic series of disputes during preharvest inspections (PHIs) (over the last 10 years at least) on the proper classification of watercourses, while missing the opportunity to look at whether or not the buffer protections are sufficient to protect resources. I have provided examples on two timber harvesting plans (THPs) that I am the registered prof. forester (RPF), with maps from previous plans on the same project area. These show the changes in watercourse designations for the same watercourses. The point here is the sufficiency of watercourse protective buffers was never part of the conversation – the discussion revolved around interpretation of rule language – not resources at risk or adequacy of standard buffer width protections.

Please let me know if I can answer any questions.

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Section 3 T8S R4W
Section 34 T7S R4W
Scale 8" = 1 Mile  CI=40'

TIMBER HARVEST PLAN MAP  Showing EHR and Site Index

Detail Map (Planimetr

Edward A. Tunheim RFF #79

RESOURCE MANAGEMENT
USGS 7½ minute La Honda Quadrangle Map. Portion of section 3, T 8S, R 4W; and portion of section 34, T 7S, R 4W, all in MDB & M.
MAP

Metzger 1990 Timber Harvesting Plan
USGS 7½ minute La Honda Quadrangle Map. Portion of section 3, T 8S, R 4W; and portion of section 34, T 7S, R 4W, all in MDB & M.

METZGER THP
THP-1-90-674-SCR

One inch equals 500 feet, 40 foot contour intervals

Existing Seasonal Road
Existing Landing
Existing Skid Road
Proposed Skid Road
Landslide
Harvest Area

Watercourse Class
Temporary Crossing
Addenda Site Reference
House

SW 1/4, Sec. 21, T 10 S, R 2 E, MDB&M
USGS 7½ minute Loma Prieta Quad Map. Portion of Salsipuedes Rancho and portion of SW ¼ section 21, T 10S, R 2E; all in MDB&M