



**Statewide Forestry Services**  
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**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.

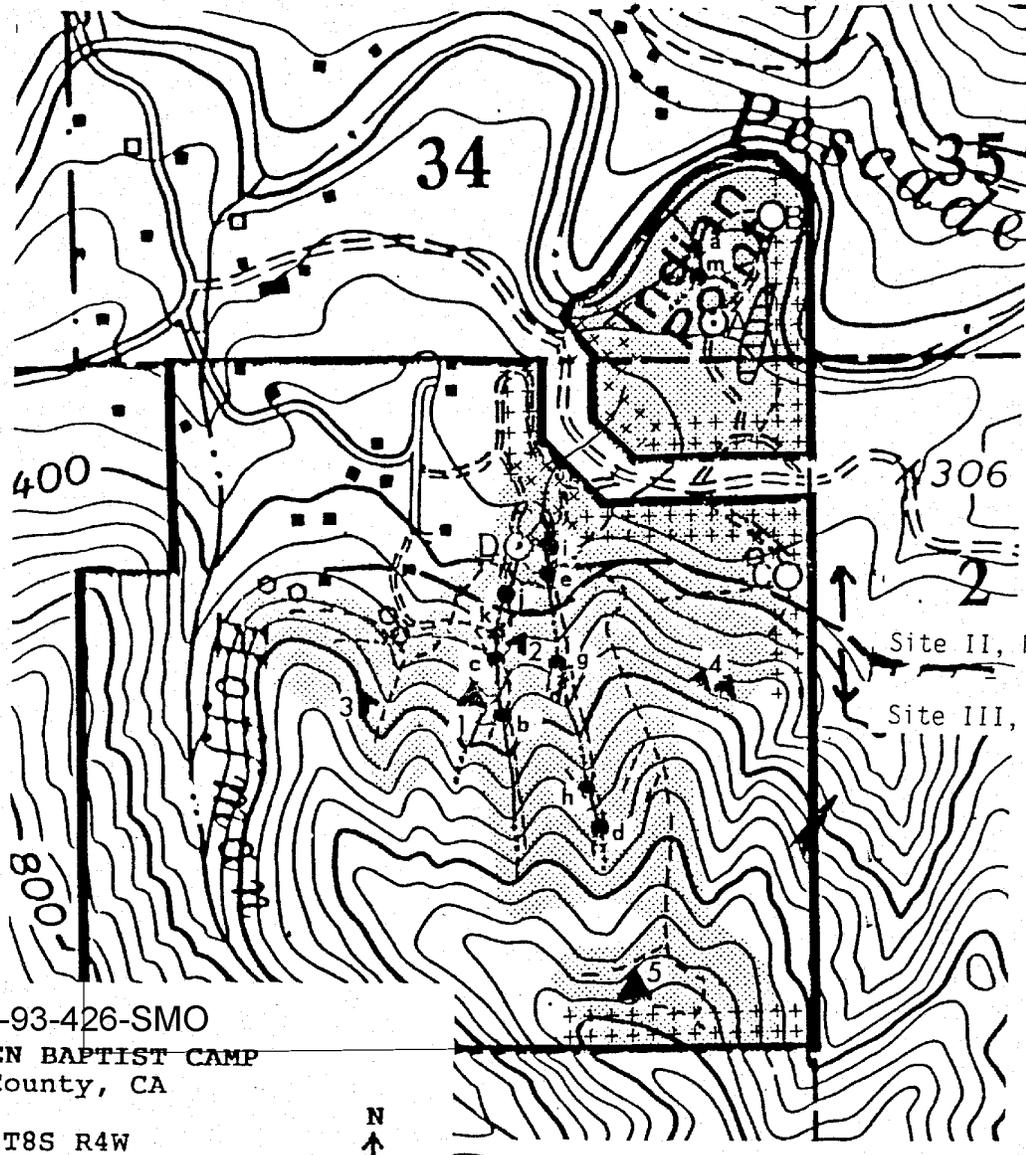
A handwritten signature in blue ink that reads "Christopher Hipkin".

Christopher Hipkin, Forester/Botanist  
Oakland CA  
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**MAP**

**Redwood Glen 1993 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.



THP-1-93-426-SMO  
 REDWOOD GLEN BAPTIST CAMP  
 San Mateo County, CA

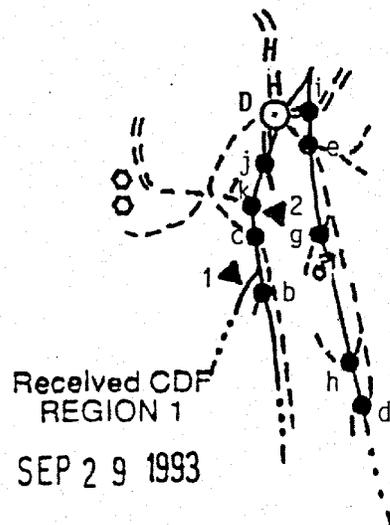
Section 3 T8S R4W  
 Section 34 T7S R4W  
 Scale 8"=1 Mile CI=40'



**TIMBER HARVEST PLAN MAP** Showing EHR and Site Index

Detail Map (Planimeter)

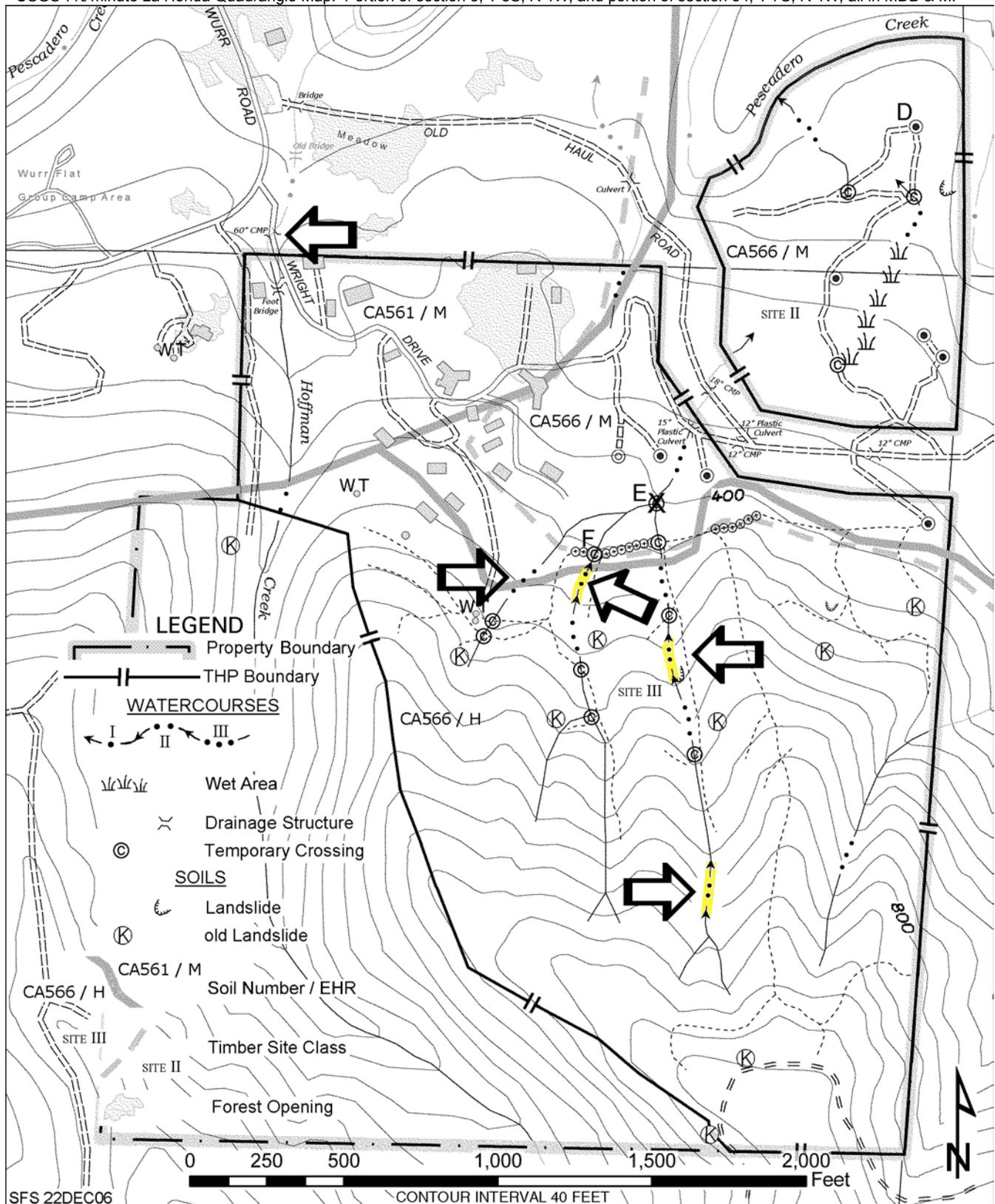
- Property Line
- Harvest Area
- Special Treatment Area
- Existing Seasonal Rd.
- Proposed Seasonal Rd.
- Class I Stream
- Class III Watercourse
- Proposed Trail
- Watercourse Crossing
- Existing Landing
- Proposed Landing
- Water Tank
- Mudflow
- Wet Area
- Spring
- Structure
- Class II Stream



**MAP 2a**

**Redwood Glen 2006 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.



**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**

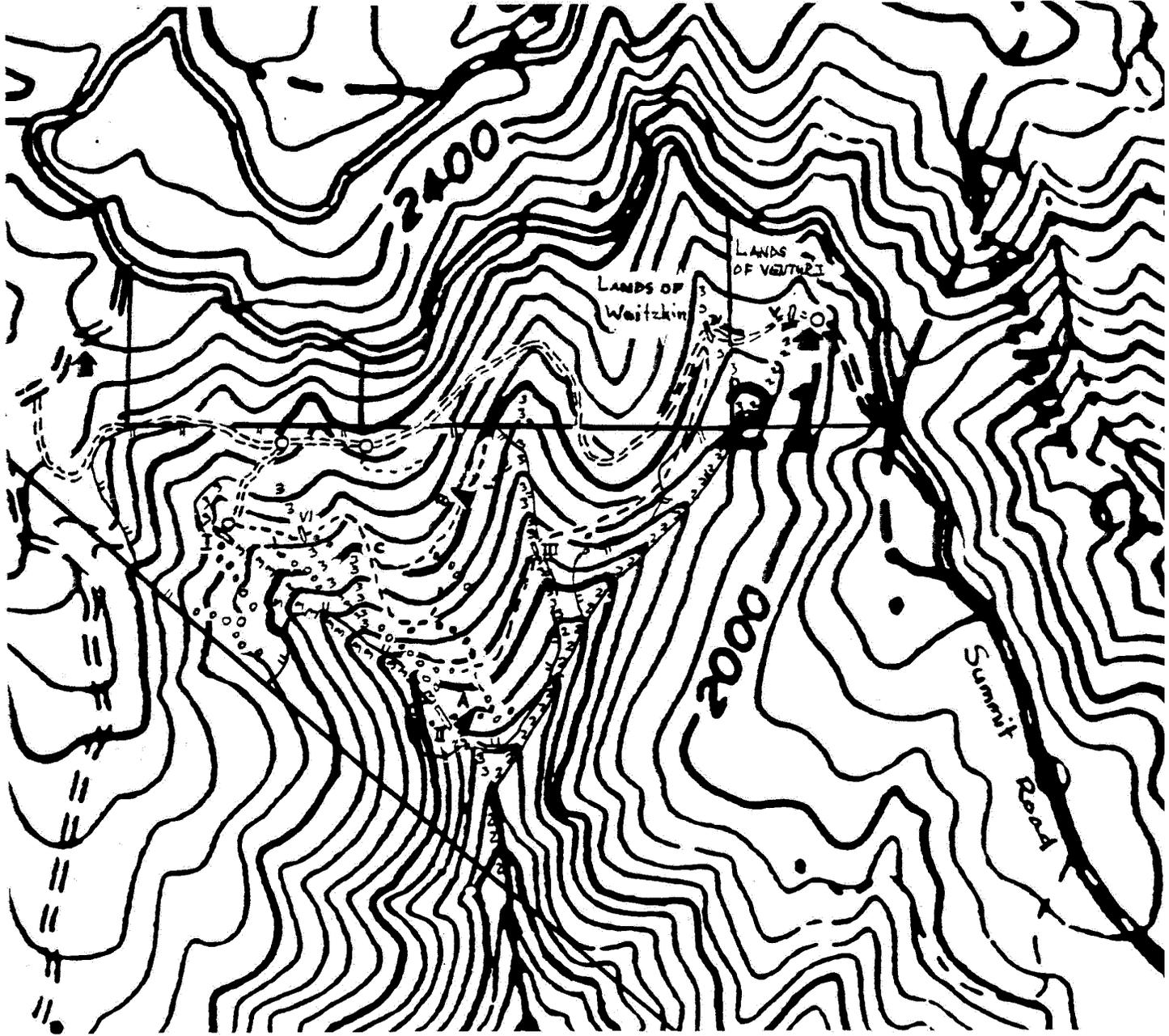
SW ¼, Sec. 21, T 10 S, R 2 E, MDB&M

**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    2 2 2 3 3 3
- Temporary Crossing    = = =
- Addenda Site Reference    8
- House                      ▲



MAP 2

Siller 2007 Timber Harvesting Plan

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

