

BOARD OF FORESTRY AND FIRE PROTECTION

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December 14, 2018

Harlan Tranmer, President
California Licensed Foresters Association
2149 Carson Mesa Road
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Mr. Tranmer,

The California Licensed Foresters Association (CLFA) submitted a letter to the Board of Forestry and Fire Protection (Board) on October 30, 2018 expressing concerns in response to a [Board Memorandum](#) indicating that the California Department of Forestry and Fire Protection (CAL FIRE) would not accept Plans, as defined in 14 CCR § 895.1, and Exemptions (harvest documents) filed after December 31, 2018 if those harvest documents were not prepared and submitted upon recently developed forms that will support implementation of [CalTREES](#), the online platform that will facilitate efficiency in harvest document submittal and Plan review and approval.

I do want to express my regret in the lateness of this reply, particularly considering the concerns expressed and the rapidly approaching harvest document submittal cutoff date that was previously identified.

Implementation of the CalTREES platform is of the highest priority for the California Natural Resources Agency (CNRA) under the AB 1492 Program, yet the target dates to fully implement CalTREES have been recently revised given the ongoing refinement of the online software through beta testing. The Board has continued to work with CNRA and CAL FIRE to better understand the full roll-out of the CalTREES system, and therefore exercised caution in responding to your letter until a plan for full roll-out was mature.

The Board is in support of the CalTREES online system and expects that efficiencies in the Plan process will occur. These efficiencies will only be fully realized with a wide level of beta testing of all aspects of CalTREES implementation, including the CalTREES forms that will soon be required for hard copy submittal of harvest documents to the Director. The Board is aware that CAL FIRE engaged with several members of CLFA and California Forestry Association (Calforests) during the initial development of the CalTREES forms, but the Board also acknowledges that additional attention, through a second level of beta testing, would provide a significant benefit to the membership of CLFA and CalForests, CAL FIRE, other agencies engaged in the review of Plans, and the public. Therefore, the Board urges that the memberships of both CLFA and Calforests continue beta testing all CalTREES forms and provide CAL FIRE with a single inventory of issues related to technical challenges associated with the use of the forms or if information being requested upon the forms appears to not conform to Board rules.

At the December 5, 2018 Board Meeting, George "YG" Gentry, Calforests Vice President of Regulatory Affairs (georgeg@calforests.org) volunteered to be a point of contact to collect and assimilate the identified CalTREES form issues and ultimately provide them to CNRA and CAL FIRE. Therefore, the Board requests that the membership of CLFA and Calforests continue to beta test the CalTREES forms and provide technical or rule-related issues to Mr. Gentry timely, so that an inventory of these concerns can be provided to CNRA and CAL FIRE no later than March 1, 2019. CNRA and CAL FIRE will review the inventory of issues and make

any necessary technical or rule-related form revisions prior to the required use of the forms, which will occur on July 1, 2019.

CalTREES is being launched under a mandate of the Administration. [Executive Order B-52-18](#) specifically calls upon the Board, CAL FIRE, and other Plan review agencies to develop an “online timber harvest permitting system” that will “synchronize and expedite the regulatory review of permits under the Forest Practice Act”. The Board is in full support of this effort, while the timeliness of the successes associated with CalTREES is reliant upon a cooperative effort among the participating state agencies, Registered Professional Foresters (RPF), Licensed Timber Operators, landowners, and interested members of the public.

In summary, the Board, through discussion with CNRA and CAL FIRE has determined that full roll-out of the CalTREES online platform will not occur on January 1, 2019. It is anticipated that CalTREES will be fully available for use by all stakeholders, including the RPF community, no later than April 1, 2019. Subsequent to April 1, 2019, harvest document submittal will be available via online submittal, hard copy submittal on older Plan forms, or hard copy submittal via the CalTREES forms. The Board realizes that changes in process can be trying, but advises early and consistent engagement in all aspects of the CalTREES process, and encourages use of the CalTREES forms as soon as possible, to ease the imminent transition for Plan submittal, review, and approval. The Board, CNRA, and CAL FIRE all share the eventual goal of having all harvesting documents directly entered into CalTREES by the Plan submitters.

The Board requests that all technical and rule-related issues be transmitted to George “YG” Gentry at georgeg@calforests.org so that he, on behalf of the RPF community, can act as a single liaison to CNRA and CAL FIRE with an inventory of issues and verify that remediation of such issues, where appropriate, has been incorporated into the CalTREES forms and the CalTREES on-line system. The Board supports CAL FIRE in the required use of CalTREES forms for all harvest document submittals as of July 1, 2019.

Please feel free to contact me with any questions or concerns that you may have in regard to this matter.

Respectfully,



Matt Dias
Executive Officer
Board of Forestry and Fire Protection

