March 2, 2015

Board of Forestry and Fire Protection  
Attn: Thembi Borras  
Regulations Coordinator  
P.O. Box 944246  
Sacramento, CA 94244-2460

RE: Calforests’ support of “Working Forest Management Plan” adoption by Board of Forestry

Dear Chair Gilless and Board Members:

The California Forestry Association (Calforests) supports the adoption of the “Working Forest Management Plan” (WFMP) by the Board of Forestry. The Working Forest Management Plan would allow for the perpetual timber management on non-industrial timberland ownerships of up to 15,000 acres in size. Calforests believes that providing these ownerships with an option, such as the WFMP, to manage their timber will help to realize long-term goals for all private timberlands in California such as increased forest health, decreased potential for catastrophic wildfire, and the promotion of long-term forest management. This long-term management will provide many of the same benefits currently associated with the Non-industrial Timber Management Plan. These benefits, outlined in the WFMP Initial Statement of Reasons, include “the retention of open space, protection of watersheds, water quality and forest soils, and the maintenance of diverse habitats for fish and wildlife....”

However, Calforests has some concerns with the proposed WFMP draft. Additional provisions added to the WFMP draft during Management Committee review and revisions in 2014 have added various new requirements to the draft WFMP rule. These new provisions are above and beyond what was passed in the underlying statute, AB 904. When AB 904 was passed and signed into law on October 8, 2013, there was detailed language included in the bill for the protection of all forest resources. These protections were far-reaching and included measures for the protection of wildlife, water resources, soil, cultural resources, and virtually every other resource. Calforests believes that the language contained in AB 904 should have been used with virtually no major modification as the text for final WFMP draft rule. The addition of a number of new requirements and provisions may, in our opinion, have compromised the cost-
effectiveness of the WFMP. This, in turn, may directly affect how many landowners will ultimately opt to use a WFMP on their ownerships.

Despite these issues, Calforests still supports the underlying intent of the WFMP, and we encourage the Board of Forestry to adopt the WFMP—with significant additional revisions—at their March 4, 2015 meeting. We encourage monitoring its implementation to evaluate its efficiency, effectiveness and utilization.

Thank you for the opportunity to comment on this matter.

Sincerely,

David Bischel, President

VIA EMAIL: publiccomments@BOF.ca.gov