



Forest Landowners
OF CALIFORNIA

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BOARD OF FORESTRY AND FIRE PROTECTION

June 12, 2015

Dr. Keith Gillless, Chair
Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

RE: Working Forest Management Plan (WFMP) Proposed Rule Language

Dear Dr. Gillless and Members of the Board:

The Forest Landowners of California (FLC) has reviewed the above-referenced rule package. We would like to express thanks to you, the Management Committee and Board staff for the time and effort you have spent to get this rule package to its current state. We especially appreciate that the Management Committee and Board staff consulted with legislative staff when questions of intent arose during the development of the regulatory language.

FLC is supportive of the proposed rule package; we would like to urge the Board to **adopt Option 2 relative to proposed regulation 1094.6(j)**. As a party to the development of the statutory language, FLC believes that Option 2 more closely reflects the legislative history and intent of the Legislature after the Board's adoption of the Road Rules Package in 2013.

In 2013, Assemblyman Chesbro asked FLC and the California Licensed Foresters Association (CLFA) members to join his Forestry Advisory Committee. This committee composed of a diversity of stakeholders was convened to consider an expansion of the present NTMP process, legislated 26 years ago in 1989, to larger timberland owners intending to manage their lands under an uneven-aged system. From that committee, the redrafting of the WFMP took shape through numerous committee meetings, public meetings, and field trips to become AB904 (Chesbro, 2013). FLC and CLFA members have been involved in every step of the process from concept development, numerous meetings with legislators, staff, and interested parties, hearings in both legislative houses, and its signature by Governor Brown, and this rule making process with the Board of Forestry. Members of both organizations have volunteered hundreds, if not thousands, of hours into this effort. This is a comprehensive forestry bill that comes at the combined effort of landowners, foresters and other interested stakeholders.

Significant input was provide by Cal Fire staff (monitoring provisions), the Water Quality Control Boards (erosion control plan) and the Department of Fish and Wildlife (conservation of both flora and fauna). This input was accepted by most of the stakeholders involved in the process in efforts to balance environmental concerns with the development of a long-term forest management plan that was functional and economically viable.

FLC requests that the Management Committee and Board retain that balance in the final WFMP regulatory language. Throughout the legislative process there seemed to be broad agreement that the interest of the state would be served by enabling moderately large private timberland landowners to commit to a long-term management strategy through the use of a permit such as the WFMP. This benefit to the state will only materialize if the WFMP contains economically affordable monitoring and other requirements so that landowners' interests are served by entering into this permit. Our hope and vision has always been that this permit be widely adopted by eligible landowners and not become an unusable addition to FPRs much like the PTHP/PTEIR has proven to be.

FLC would also ask that the Board consider tasking the Effectiveness Monitoring Committee to monitor the use and implementation of the rule package to ensure that it is not overly burdensome to individual landowners who wish to practice uneven-aged management on their timberlands.

Sincerely,

A handwritten signature in blue ink that reads "Charll K. Stoneman". The signature is written in a cursive style with a long horizontal stroke at the end.

Charll K. Stoneman
President