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2 March 2015

comments on the WFMP to <publiccomments@bof.ca.gov>

J. Keith Gilles, Chairman
California Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244

Dear Dear Chairman and Board --

The 45-Day Notice Working Forest Management Plan rules package is inadequate as a Planning Document. It does not provide a professional, and high standard format, that adequately meets the needs of such an ambitious program, nor does it ensure compliance with the needs of specific forest practice rules, notably 14 CCR 916.4 (a) and (b). It has been claimed that implementation of 916.4 is part of the WFMP, but if that implementation is of the standard found in many if not most THPs, that implementation falls way short.

Each WFMP needs to have the basic elementary information presented in the same way, in the same order and format. Additional information can be included as the submitter sees fit, but a set of basic requirements must be standardized that are adequate for the protection and recovery of WFMP forests through generations. This is doable and essential and is missing.

Sincerely,

Richard Gienger