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BOARD OF FORESTRY AND FIRE PROTECTION

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1 August 2016

*Sent via electronic mail to: publiccomments@bof.ca.gov on date shown below*

1 August 2016  
J. Keith Gilles, Chairman  
California Board of Forestry and Fire Protection  
P.O. Box 944246  
Sacramento, CA 94244

RE: Comments on the latest 45-day Notice for Proposed Adoption  
of Regulations for the Working Forest Management Plan

Dear Chairman Gilles and Board Members:

Appended are my comments from 15 June 2015 on an earlier 45-Day Notice. They remain relevant and applicable. I'll just emphasize three points, today:

- 1) There are no adequate requirements to ensure increasing inventory and quality of California's private and state forestlands – per the deep intent of the Z'berg/Nejedly Forest Practice Act: protect, restore and enhance productivity.
- 2) There are no adequate formats and requirements for information of conditions, milestones, and in documentation of progress for the WFMP in a 21<sup>st</sup> century professional and transparent environmental document.
- 3) There are no assurances that specific crucial rule implementation, such as 14 CCR 916.4 will be adequately realized with high standards and standard formats that will enable protection, restoration and enhancement of forest and watershed values.

Inherent in the scope of what is being proposed is also the exclusion of benefit and help to the truly small forest landowners. The WFMP facilely skirts high-minded intents spelled out in the AB 1492/Timber Regulation and Forest Restoration Fund/Program.

Please vote “no” until reforms that are truly needed are before you.

Sincerely,

Richard Gienger

[On behalf of myself and Forests Forever]

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Box 283, Whitethorn  
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15 June 2015

*Sent via electronic mail to: publiccomments@bof.ca.gov on date shown below*

June 15, 2015  
J. Keith Gillless, Chairman  
California Board of Forestry and Fire Protection  
P.O. Box 944246  
Sacramento, CA 94244

RE: Comments on 45-day Notice for Proposed Adoption  
of Regulations for the Working Forest Management Plan

Dear Chairman Gillless and Board Members:

One of the most disheartening processes I've witnessed at the California Board of Forestry and Fire Protection and in state government, since my first Board meeting in 1977, is the Working Forest Management Plan (WFMP). And there have been some very disheartening processes. The latest run toward a plan of the WFMP-type started out with great promise with broad and spirited discussions at the much broader-based participation of the Timber Harvest Working Group about what a larger NonIndustrial Management Plan (NTMP) might look like. What could be applied from lessons learned from the NTMP, for instance? And a multitude of other considerations. There was certainly enough that needed to be addressed that warranted the status of a two-year bill. If that had happened, I certainly think that the WFMP would be of a much higher caliber – and still be a real boon for large-small owners, keeping timberland in production, and for increasing the quality of future forests in California.

There has been a strange and persistent resistance to really making the WFMP a modern state-of-the-art forest management plan. These are large plans and if all goes well pertain to the managed lands in perpetuity. I am reminded of Mike Fay's admonition to the assembled forest/forestry people to set the future for the quality and extent California Redwood Forests with the same leadership that California brought to high technology. I'm afraid that we weren't paying attention or taking his findings and vision seriously.

These noticed regulations fall way short of comprising a state-of-the-art management plan that coherently, in well ordered high-standard content, and with basic required templates of information that will stand the immediate and long-term needs for the recovery of California's private timberlands. Basic obvious needs such as adequate implementation of 14 CCR 916.4, and incentives for older higher quality forests are missing. Yes, all-aged management is a worthy goal, but the standards in the present WFMP are not up to the professed or actual needs of future recovered forest and watersheds/.

Respectfully,

Richard Gienger for myself & Forests Forever