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Louis Nastro
State Park and Recreation Commission
P.O. Box 942896
Sacramento, CA
94296-0001

RE: Fire Prevention for Parks and Private Landowners within Special Treatment Areas.

Dear Commission Members:

The California Forest Practice Rules specify that within 200 feet of national, state, regional, county or municipal park boundaries, a Special Treatment Area (STA) exists to address potential risk from proposed timber harvesting operations. A special prescription must be developed for STAs pursuant to the following:

14 CCR 913.4, 933.4, 953.4 Special Prescriptions

The following special harvesting methods are appropriate under certain conditions:

(a) Special Treatment Area Prescriptions. *Special consideration in Special Treatment Areas shall be given to selection of a regeneration method or intermediate treatment compatible with the objectives for which the special area was established. Such areas shall be identified in the plan. To assure the integrity of legally designated historical and archaeological sites and legally designated ecological reserves, and that the objectives of the special treatment areas are met, the RPF and the Director may agree, after on-the-ground inspection, if requested by either party, on specific silvicultural and logging practices to protect such areas. The Director shall notify affected agencies or groups with expertise in the resource involved in the special treatment area of any such areas located during the THP review process.*

Currently, the activities proposed in an STA vary tremendously according to site-specific issues and individual Park policies. Site-specific prescriptions are always more effective than a “one size fits all” approach. We commend the staff at the various parks in your agency and other agencies on their professionalism towards developing site-specific protections and mitigations.

The purpose of this letter is to discuss the need for an understanding of the risks posed to landowners on both sides of the property line. Within some STAs for parks, harvest operations have become so restricted that our members have become concerned

about the risk of wildfires moving unchecked from parks onto private property and vice versa.

Park policies regarding fire suppression are evolving constantly and, in some areas, fires are allowed to burn un-suppressed. Budget issues, political decision-making, and the continual abandonment of roads within parks, are issues that are causing our members to be very concerned that park managers will not be able to actively suppress fires that threaten adjacent private properties. The pendulum swings both ways. Parks lands are at risk from fires that originate in adjacent private holdings as well.

In terms of wildfire risk, forest conditions in and around many of the STAs for parks dictate that such STAs not be treated as a no-harvest area. In these conditions, STAs should be treated as an opportunity to modify fuels, create a defensible fire break, complement park goals, and provide the private landowner and park managers with some peace of mind. This can be accomplished by prescribing a shaded fuel break within the STAs. This technique maintains larger, more fire resistant trees, while clearing smaller trees and brush to reduce fire intensity and reduce crown fire potential. Shaded fuel breaks have a proven track record of success. We believe they can be used to protect both private property as well as the State Parks Property. In assessing risk to the parklands, park managers should balance the potential for edge effect with the potential for a stand replacing fire.

In summary, we ask that the Park Commission encourage park representatives involved with the review of Timber Harvest Plans to take advantage of the opportunity to use methods such as shaded fuel breaks within STAs when such methods are consistent with the landowner's and the State Park's objectives.

Sincerely yours,

Chris Quirnbach, RPF #2623
President

The California Licensed Foresters Association, with approximately 750 members, represents the common interests of California Registered Professional Foresters. The Association provides opportunities for continuing education and public outreach to its membership, which includes diverse professionals affiliated with government agencies, private timber companies, consultants and the academic community. Governed by an elected Board of Directors, CLFA was established in 1980 after the passage of the landmark California Professional Foresters Law.