



CALIFORNIA  
LICENSED  
FORESTERS  
ASSOCIATION

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October 18, 2004

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

RE: Fuel Hazard Reduction, 2004

Dear Board Members:

The California Licensed Foresters Association (CLFA) has reviewed the proposed rule language titled "Fuel Hazard Reduction, 2004" (proposed package) as delineated in the 45-day notice circulated September 3, 2004. CLFA is supportive of this effort by the Board of Forestry and Fire Protection (BOF) to streamline the regulatory process and provide a means to reduce hazardous fuel buildup around communities threatened by potentially catastrophic wildfires. CLFA would like to submit the following comments to the record for the consideration and review of the Board of Forestry (BOF) on the proposed package.

1. CLFA strongly supports the proposed package. Extending the expiration date of the rule package will provide more incentive for landowners to use this rule by giving them more lead time and certainty with regards to planning and scheduling fuel treatments well in advance to ensure that the necessary equipment and manpower is available. The proposed package allows for a level of fuel treatment consistent with the relatively narrow geographic areas in which the proposed package may be applied (i.e. areas with the most immediate and potentially significant threat: homes, infrastructure facilities, and evacuation routes).
2. By making the proposed package permanent, the BOF will be able to more easily modify the rule in the future, as opposed to rules resulting from the passage of legislation which would be much more difficult to amend. This would be both a means of covering unforeseen "loopholes" as well as modifying restrictions that might make the rule too cumbersome or costly to be implemented. For example, if the achievement of a 4 ft. flame length height for ignitable surface fuels after treatment is so cost prohibitive that the rule cannot be applied, would some other standard (maybe 5 ft. or 6 ft.) be sufficient to meet the rule's intent without causing significant environmental damage?
3. While there has been much discussion about limiting the size of trees that can be harvested under the proposed package, the existing size specifications provide the timber operator greater flexibility in designing skidding patterns to reduce mechanical damage to residual trees. The existing size specifications also help foresters better achieve the fuel reduction

objectives of the proposed package by focusing less on stump diameters and more on the treatment of stand structure. A 20” stump diameter tree, in the correct stand, can be just as much of a “fuel ladder” as a 10” stump diameter tree. Finally, the size limitation flexibility also reduces operating costs, providing further incentive to use the Emergency Notice.

The fuel conditions over much of California’s forested landscapes combined with increasing development pressures necessitate that the BOF take action on this issue. CLFA encourages the BOF to approve the proposed package as delineated in the 45-day notice. Please consider these comments on behalf of our members who represent the majority of the professional expertise used to enforce and comply with our State’s Forest Practice Regulations.

Very truly yours,

Chris Quirnbach, RPF #2623  
President, CLFA