



CALIFORNIA
LICENSED
FORESTERS
ASSOCIATION

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October 4, 2004
Board of Forestry and Fire Protection
Attn: Christopher Zimny
Regulations Coordinator
P.O. Box 944246
Sacramento, CA 94244-2460

RE: Road Management Plan, 2004

Dear Board Members:

The California Licensed Foresters Association (CLFA) has reviewed the proposed rule language titled "Road Management Plan, 2004" (proposed package) as delineated in the 45-day notice published August 20, 2004. CLFA is supportive of this effort by the Board of Forestry and Fire Protection (BOF) to provide a voluntary means for landowners and Registered Professional Foresters to work with reviewing agencies to develop a long-term strategy for road construction/reconstruction, maintenance, and abandonment.

With California's inherent variability in timberland across the state, the ability to develop site-specific mitigation measures is important in cost-effectively mitigating potential impacts to public trust resources from roads. The language in the rule package appears to allow the Registered Professional Forester (RPF) preparing a plan the opportunity to develop site-specific mitigation measures for forest roads. This rule proposal allows for future plans to rely upon an approved Road Management Plan (RMP), potentially increasing RPF work efficiency over time. In addition, the RMP as proposed should provide some certainty to landowners regarding potential road maintenance issues as future plans are submitted. CLFA hopes this rule package can be a template to more progressive ways of identifying and prioritizing management efforts through a larger landscape planning approach. Flexibility and certainty in regulatory oversight are good examples of ways state policy can encourage continued investment in private forestland.

Back in the beginning of 2003, the BOF Ad Hoc Roads and Watershed Management Committee contacted several agencies including NOAA Fisheries, Central Coast Regional Water Quality Control Board, and the Department of Fish and Game with a letter inviting their participation in the development of the proposed package. CLFA encourages the BOF to continue dialogue with the appropriate agencies so that the RMP may become a method for satisfying regulatory issues under the purview of such agencies (i.e. 4(d) rules, TMDL issues, programmatic 1600 agreements, etc.).

Please consider these comments on behalf of our members who represent the majority of the professional expertise used to implement and enforce our State's Forest Practice Regulations.

Very truly yours,

Chris Quirnbach, RPF #2623
President, CLFA