



CALIFORNIA
LICENSED
FORESTERS
ASSOCIATION

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The Honorable Joe Simitian
California State Assembly
State Capitol
Sacramento, CA 95814

Reference: AB 47
CLFA Position: Oppose

Dear Mr. Simitian,

The California Licensed Foresters Association (CLFA) has reviewed your AB 47 and concluded that it is yet another blow to the surviving remnants of California forestry. Additional cumulative effects reporting requirements and analysis, on top of the existing Board of Forestry rules (14 CCR 898, 1034, Cumulative Effects Assessment Checklist and Technical Rule Addendum #2), is redundant and will only pile more burdens upon landowners and managers – people who are already struggling with a costly and unpredictable forest practice regulatory arena.

We recognize the public trust intent behind your legislation, but question whether additional complexity and expense will lead to better forest management or to little or no net gain to the state's environmental quality while accelerating the ongoing decline of a once-vital primary industry in our state. We feel that if there are informational needs that are not being met, the California Department of Forestry and Fire Protection (CDF) is the most logical clearinghouse for such data.

CDF is lead agency in the timber harvest plan review process. Tapping the existing informational resources of CDF would be much more efficient than piling new reporting requirements onto landowners and the foresters they look to for professional guidance. Another concern CLFA has is AB 47's requirement to hire an independent biologist in certain circumstances. Although in practice many foresters do employ biologists and other resource specialists to answer questions outside their areas of professional expertise, formally mandating such a practice in law is an extreme and burdensome step.

We note that Californians now import 80% of the lumber products which we use from other states and foreign countries. Timber harvest levels in the Golden State have plunged by over 60% since 1990. Many mills have closed and thousands have lost their jobs.

In light of these facts, perhaps the time is coming to rethink our de facto policy of exporting the environmental burdens associated with forest management to areas outside our state borders; lands which commonly have less stringent forest practice standards in place than those here in California. Our environment would be better served, we believe, if citizens and policy makers recognize the ethical dimension of this issue rather than

continuing down the path of over-regulating here and importing to make up for the lost supply.

Mr. Simitian, California contains 19 million acres of commercial timberland – almost 20% of our state’s entire land area. Yet we are currently harvesting less than 25% of the wood growth which is incurring in these lands. There is not a linear relationship between not harvesting timber and enhanced environmental quality, despite some of the philosophical arguments that are out there.

In conclusion, although we oppose AB 47 we are honored that you are interested in forest management, and extend an invitation to you and your staff to come to the north coast or Sierra, tour some forests and discuss these issues with our members on the ground. Our experience in meeting with legislators is that a field forestry visit is a great way to exchange viewpoints and build mutual understandings.

We hope that you take us up on this offer – I will stop by your soon to repeat it in person!

Sincerely Yours,

William W. Keye
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cc: Assembly Natural Resource Committee Staff

The California Licensed Foresters Association, with approximately 900 members, represents the common interests of Registered Professional Foresters in the State of California. The Association provides opportunities for continuing education and public outreach to its membership, which includes diverse professionals affiliated with public 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.