



CALIFORNIA
LICENSED
FORESTERS
ASSOCIATION

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March 24, 2004

The California Performance Review
c/o Office of Governor Arnold Schwarzenegger
State Capitol
Sacramento, CA 95814

To Whom It May Concern:

I am writing you on behalf of the California Licensed Foresters Association (CLFA), which represents approximately 800 Registered Professional Foresters and other associated resource professionals involved in the management of private forestlands in California. The protection of these natural resources is ensured through use of a Registered Professional Forester, also known as an RPF. RPFs are individuals that have demonstrated a thorough knowledge of the wildland environment and have been licensed by the State of California to provide technical assistance to landowners on wildland management issues.

CLFA would like to take the opportunity provided by the California Performance Review process to recommend some changes to government with regards to forest fuel reduction. CLFA's position on forest fuel reduction is based on our membership's vast experience managing California's forests. Recent large, catastrophic forest wildfires are linked to overly dense trees and high levels of woody fuel loading. These, in turn, are the legacy of past fire suppression policies and the absence of active forest management in many areas. CLFA believes that in order to protect the wealth of values and resources that Californians demand from our forests, public policy needs to encourage forest landowners to thin overstocked trees and treat flammable woody fuels. **The state's goal must be to make our forested ecosystems more resilient and less vulnerable to unnaturally hot, destructive wildfires.**

Forest thinning and fuel reduction projects are expensive treatments for a landowner. Compliance with existing regulation and permitting costs reduces the number of landowners willing and able to undertake these projects. This is a statewide problem, from the forests of Mt. Shasta in the north to Lake Tahoe in the Sierras and Lake Arrowhead in the San Bernardino Mountains.

CLFA has identified three problems and solutions that need to be addressed to reduce the threat of catastrophic wildfire in California. Implementation of these solutions will encourage landowners to thin their forests and reduce the build up of woody fuels. This will contribute to a forest being healthy and resilient to fire.

Problem # 1- The current timber harvest plan process and state regulations are acting as disincentives for landowners to thin their forests and reduce the build up of woody fuels.

Solution #1 – Streamline the costly and time consuming forest practice permitting process.

- a. *Modification of the existing non-discretionary permitting process (PRC 1038) that requires full compliance with the operational rules of the California Forest Practices Act and Regulations. Such a modification should require that a Registered Professional Forester (RPF) prescribe site specific and appropriate measures for fuels reduction and forest health while protecting water quality, aesthetic values, wildlife habitat and forest productivity.*
- b. *Forests thinned for fuel reduction must have as the primary objectives to maintain or increase the average tree diameter, increase the distance to crown height (reduce ladder fuels), modify surface fuels and reduce crown density.*
- c. *The solution must apply to all sizes of ownership's and across the forested landscape – not just around developed areas where people live. Protection of forest watershed, wildlife and recreation values are important and must not be neglected.*

Forest thinning and fuel reduction efforts will continue to be hampered unless there are adequate markets and infrastructure to process the wood products generated. Encouraging a stable supply of small log and chipped wood products is the first step in maintaining existing and building future markets for these products.

Problem #2: The removal of biomass material (fuel for catastrophic wildfires) is restricted by the low economic value of biomass chips and the lack of existing markets for the biomass material. Cogeneration plants are closing down throughout California. Many existing Cogeneration plants are not running at full capacity. Infrastructure needed to remove biomass material from the forest is deteriorating. The current monetary value for biomass chips is a disincentive to business to properly maintain existing equipment or to purchase new equipment. Catastrophic wildfires will continue to occur until an economical stable market for biomass chips is established.

Solution #2: *A public benefit of protection of life and property from catastrophic wildfire through the removal of biomass material from the forest must be realized. The following two solutions will allow business to obtain loans to purchase and maintain the expensive equipment needed to remove forest biomass material. The removal of biomass material will help to prevent catastrophic wildfires, create many new jobs, and improve air quality through a reduction in prescribed burning.*

- a. *Economic incentives must be implemented to encourage the construction of new cogeneration plants and encourage existing cogeneration plants to run at full capacity. By providing economic incentives, cogeneration plants can purchase more expensive forest biomass chips as opposed to cheaper agricultural wood waste.*
- b. *Establishment of a stable and economically fair price for delivered biomass chips. Establishment of long term contracts with business (3 years or more) for the delivery of biomass chips.*

Problem #3: Inefficient management of California Department of Forestry and Fire (CDF) Vegetation Management Program. CDF's Vegetation Management Program (VMP) is

inconsistent from unit to unit in the level of implementation of fuel modification projects. Training for new firefighters at the academy level does not fully address proper techniques for understory burning in mixed coniferous forests. Budget support for the VMP program in the urban interface and mixed conifer forest has not been adequate enough to fully implement the backlog of fuel modification projects.

Solution: #3

- a. *CDF Amador/Eldorado Unit (AEU) VMP programs should be used as a model for implementation of the VMP program throughout California.*
- b. *Reallocate funding priorities to support the VMP program.*
- c. *Maintain Registered Professional Foresters in VMP positions. The RPF's knowledge of silvicultural treatments as they relate to fuels reduction treatments is needed for a successful program.*
- d. *Require, as part of the firefighter academy training program, participation in mixed conifer forest understory prescribed burns.*
- e. *Dedicate one engine captain for implementation of on the ground projects.*
- f. *Utilize engine crews to develop short crews (4 person crews) to implement fuel reduction projects.*

The following are some reasons AEU is successful with their VMP program:

1. Successful implementation of a cooperative fuel modification program between CDF, USFS, BLM, private industry, and small private landowners.
2. Unit Chief support.
3. California Youth Authority support – fuel modification projects are top priority.
4. Battalion Chief support.
5. Fully funded VMP forester. The VMP forester is a Registered Professional Forester that understands fuels modification treatments and their effects on forest health.
6. Engine captain to implement and coordinate various on the ground VMP projects.

Contact the following CDF personnel - Mike Kirkley, Pine Grove CYA Camp Chief at (209) 296 –7591 for more details.

Effective legislation and regulatory changes will reduce the expense and encourage landowners to invest in keeping their wildlands in a more fire resilient condition. The savings in protection of life and property, reduced fire suppression costs, enhanced watershed condition and improved air quality will be tremendous. Thank you for the chance to provide input regarding potential solutions to help improve forest health and prevent catastrophic wildfires. If you need additional information from CLFA, please do not hesitate to contact us at the above address.

Sincerely,

Gary F. Howard, RPF # 1017
CLFA President