



CALIFORNIA
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May 31, 2006

The Honorable Wesley Chesbro
California State Senate
State Capitol, Room 5035
Sacramento, CA 95814

***Reference: SB 1342, as amended in Senate 3/29/06
CLFA Position: Oppose, Unless Amended***

Dear Senator Chesbro,

CLFA has reviewed your SB 1342, as amended, and respectfully must continue to oppose this legislation. The bill has two main provisions:

1. SB 1342 proposes to lengthen the minimum effective period for a Timber Harvest Plan (THP) from three to five years. However, this change is limited to only those THPs dedicated to the exclusive use of uneven age silviculture.
2. SB 1342 specifically excludes the Southern Subdistrict of the Coast Forest District (timberlands within Central Coast and Bay Area counties) from its provisions.

As to the first point, CLFA welcomes the concept of increasing the minimum effective period for a THP. Since the Z'Berg-Nejedly Forest Practice Act was promulgated in 1973, the costs – both private and public – of our system of state forest practice regulation have multiplied many times faster than the rate of inflation. Without changing any of the strict requirements for THP approval and enforcement, SB 1342 simply proposes a modest reform: Lengthen the time period available to operate under an approved THP.

Senator Chesbro, California forestry must compete with forest products producers from other states and globally. None of these must comply with California's stringent Forest Practice Act and related standards of environmental quality and regulatory compliance. It therefore makes sense to provide a bit more operational flexibility to California timberland owners by lengthening the effective period of a THP. A longer-term THP, for example, could be particularly helpful to small, non-industrial timberland owners who only choose to harvest timber when market conditions are favorable.

Unfortunately, the bill as currently written would benefit only a limited number of landowners, giving preference to uneven age management while constraining other tools

in the Registered Professional Forester's toolkit. Those utilizing even age silviculture, intermediate treatments such as commercial thinning or special prescriptions such as variable retention would receive no benefit.

Turning to the second point, there is an inherent inequity in what is being proposed. Excluding the Southern Sub-district discriminates against landowners in California's Central Coast. Silvicultural options are already strictly limited to uneven age systems in the Southern Sub-district. This bill, as written, is a proposal to modestly reward those who practice uneven age silviculture. There is no logical reason to deny the benefits of this legislation to those who are already meeting the desired standard.

Senator Chesbro, please consider amending SB 1342 to make it of equal utility to all California forest landowners. If this is done, CLFA will be in enthusiastic support. We look forward to continuing to work with your office on this legislation.

Sincerely yours,

William W. Keye, RPF #2417
Government Affairs Specialist

Cc: The Honorable Loni Hancock, Chair, Assembly Natural Resource Committee.
The Honorable Doug LaMalfa, Vice Chair, Assembly Natural Resource Committee.
Members, Assembly Natural Resource Committee.
Mr. David Titus, CDF Deputy Director, Legislation.
Ms. Melinda Terry, Deputy Secretary, Resources Agency.
CLFA Board of Directors.
Ms. Hazel Jackson, CLFA Executive Director.

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.