



June 16, 2014

Members Stuart Farber and Mary Rickert
Management Committee
California Board of Forestry and Fire Protection
1416 Ninth Street
P.O. Box 944246
Sacramento, CA 94244-2460

COMMENTS AND RECOMMENDATIONS FOR REVISIONS TO THE JUNE 6, 2014
DRAFT PLEAD, WORKING FOREST MANAGEMENT PLAN

Dear Mr. Farber and Ms. Rickert:

California Department of Fish and Wildlife (CDFW) staff has reviewed the plead, "*Board of Forestry and Fire Protection, June 6, 2014 Draft, Working Forest Management Plan*" and previous drafts of this plead discussed before the Management Committee of the California Board of Forestry and Fire Protection. CDFW is taking this opportunity to provide comments and recommendations for revisions, which are included in the enclosed copy of the June 6, 2014 draft of the plead, for the Management Committee's consideration.

According to the now-enacted legislation, pursuant to Article 7.7, Assembly Bill 904 (Chesbro, 2013) created a new option for landowners to manage "working forest" timberlands comprising less than 15,000 acres. Working Forest Management Plan (commencing with Section 4597), Chapter 8 of Part 2 of Division 4 of the Public Resources Code, a working forest management plan (WFMP) has the "...objectives of maintaining, restoring, or creating uneven aged managed timber stand conditions, achieving sustained yield, and promoting forestland stewardship that protects watersheds, fisheries and wildlife habitats, and other important values." WFMPs are intended to build on the model provided by the Nonindustrial Timber Management Plan, which is another option available for management of small forest ownerships.

The draft plead proposes to add sections 1094 through 1094.31 to the Forest Practice Rules (FPRs, Title 14 California Code of Regulations) to implement regulation of WFMPs. Much of the language contained in the plead comes directly from the enacted legislation.

In addition to suggested relatively minor edits and language clarifications, CDFW's comments and recommended revisions address three main areas:

- 1) consistent terminology covering categories of special-status species;
- 2) consistent disclosure of the various types of "waters"; and
- 3) the five-year review process.

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CDFW appreciates the opportunity to provide comments and recommendations to the Management Committee on the June 6, 2014 WFMP plead. Should you have any questions and/or would like to discuss our input, please contact Environmental Program Manager, William Condon, with the Department's Timberland Conservation Program in the Habitat Conservation Planning Branch, at (916) 651-3110 or by email at William.condon@wildlife.ca.gov.

Sincerely,



Sandra Morey
Deputy Director

Enclosure

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