



October 30, 2018

J.Keith Gilles, Chair
State Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

RE: Undated September Board Memo mandating use of CALTREES forms

Dear Chairman Gilles and Board of Forestry and Fire Protection;

CLFA was formed by Registered Professional Foresters (RPFs) in 1980. The Association represents Industrial, Consulting, Academic and Public foresters working together for the common cause of enhancing the role of the Professional Forester in California.

A number of CLFA members have expressed concern over the memo authored by the Board's Staff and distributed in early September which states "Cal Fire will not be accepting timber harvest document submissions on the old timber harvest forms after December 31, 2018". Putting aside any concerns we may have with the administrative process which resulted in the promulgation of the memo, we are very concerned with this action.

To be clear, is the Board directing the Department to not accept for filing any THP which is submitted on a form other than the CALTREE forms available on the Calfire website after December 31st? .

While electronic submission of timber harvest document has long been sought by some involved in the process, including some of our membership, CALTREES is simply not ready. The forms are essentially designed for data entry, and do not format the responses into a cohesive document. The CALTREES forms comprise 14 separate documents and produce a THP with a minimum of 40 pages. It has not been adequately vetted or tested by practitioners. On the other hand, many Registered Professional Foresters have spent a great deal of effort refining their Timber Harvest templates to meet their work flow needs and assure their submissions meet the requirements of the Board.

Since the 'roll-out' of the CALTREES forms, our members have identified a number of deficiencies but those corrections have not been addressed. It seems that there are a number of examples where the forms ask for information not mandated by regulation, statute, or case law. Clearly, the most common comment has been the formatting and



the lack of ability for the RPF to correct or modify it so the finished document meets their professional standards of presentation.

The primary reason to support the mandated use of the CALTREE forms appears to be to facilitate Department staff to gather information for data entry into the new THP database. While this may be a reasonable ancillary goal; it is certainly not the intent of the Timber Harvest submission and review process.

Timber Harvest Plan documents are an important part of a complex process than has among its goals to disclose to the public the details of a project and its potential impacts. Importantly, the plan is to serve as an enforceable tool for the timber harvest practitioners (the Licensed Timber Operators) to successfully implement the approved project. This is the overarching priority of the harvest document. These CAL TREES forms need further improvement in order to achieve this priority.

We request that the Board clarify the letter from Board Staff on the use of CALTREE forms at this time. The Department should complete its review and testing of the forms, perfect the on-line submission capabilities through beta-testing and debugging of the program, then provide for optional use for a period to allow professionals time to adapt their work flow to the new system.

Professional Foresters will embrace the system when it improves their workflow and results in a better product.

Sincerely,

Harlan Tranmer, President
California Licensed Foresters Association