From: John Munn
To: Public Comments@BOF
Subject: Board of Forestry Rulemaking - Roads and Competitiveness
Date: Wednesday, October 13, 2021 7:51:34 AM

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To whom it may concern,

Having seen the Rules from both sides, I have the following comments:

1. By only allowing the construction of new roads under a Timber Harvesting Plan (THP), the Board of Forestry and Fire Protection's Forest Practice Rules are reducing the ability of private landowners to conduct thinning and other forest operations for the purpose of fire protection because of the expense of preparing a complete THP. This same problem prevents relocation of existing roads to places that are less damaging to water quality or provide other environmental benefits. It could be fixed by the Board by allowing road construction as part of thinning and other exemptions.

2. The Board of Forestry and Fire Protection's Forest Practice Rules have had the unintended consequence of reducing the market for timber harvesting in California by reducing the number of mills purchasing timber and by consolidating the ownership of timber lands and milling capacity. At this point, I don't know how or if this can be fixed by the Board, but it needs to be recognized.

John Munn,
Former CDF Forester II