



SIERRA PACIFIC INDUSTRIES

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

Re: DRAFT Tethered Operation Amendments, 2020

Chair Gilles and Board Members,

Sierra Pacific Industries is pleased that the California Board of Forestry and Fire Protection (Board) has taken up the work of revising the Operations rules (§ 914.2 [934.2, 954.2]) in order to accommodate the use of Tethered Logging systems. As the Initial Statement of Reasons correctly indicates this harvesting technology has improved the harvesting efficiency, personnel safety, and Silvicultural results where it has been utilized in many different regions of the world including the Pacific Northwest. The Board codifying rules that support the use of tethered harvesting provides important regulatory certainty for Licensed Timber Operators (LTO) that are considering the large capital investments necessary to acquire this machinery for use in California.

The Draft Tethered Operation Amendments are a good interim step to allowing the integration of these technologies into harvesting in California. This rule package does several good things: 1) It acknowledges Tethered logging as an acceptable operational standard on slopes >65% and >50% with high or extreme EHR. This will expand the economic feasibility of performing a variety of beneficial Forestry activities on steep slopes that would otherwise be precluded due to the ever-rising costs of conventional cable yarding operations. 2) Tractor operations in cable units will be allowed as a standard practice up to 50% slopes. This practical accommodation allows RPFs and LTOs to deploy the most efficient combination of machines in harvest units without requiring a justification for activities that otherwise would be considered a standard harvesting practice (i.e. ground based equipment on slopes up to 50%). 3) Waterbreaks will not be required where trails have adequate natural drainage, drainage structures, or Surface Cover or Woody Debris to dissipate water flow and trap sediment to prevent soil

loss. This standard will allow the operational efficiencies of tethered machines to be expressed both in efficient log production and environmental protection, and avoids a standard that requires indiscriminate waterbreak construction, all while maintaining waterbreak construction as a backstop if there is not adequate drainage or surface cover to dissipate water flow and trap sediment to prevent soil loss.

Sierra Pacific Industries supports this rule package and encourages the Board of Forestry to approve these rules for harvesting operations.

Sincerely,

A handwritten signature in green ink that reads "Cedric Twight". The signature is written in a cursive style with a prominent loop at the end of the last name.

Cedric Twight
RPF #2469
Manager Regulatory Affairs
Sierra Pacific Industries

