

## **Board of Forestry and Fire Protection Staff Report**

### **DRAFT Problem Statement for:**

### **Tethered Equipment Operations Utilization within the Forest Practice Rules**

#### **December 10, 2019 Joint Committee Meeting**

At their August 2019 meeting, the Forest Practice Committee initiated discussions surrounding the utilization of tethered logging equipment under existing Forest Practice Rules (Rules) related to tractor and cable operations. Those, and subsequent discussions, provided insight into both the capabilities of modern tethered logging equipment, as well as their limitations under existing Rules. The material considered by the committee to this point has included draft regulatory text, input from various stakeholders including practitioners of tethered logging and project proponents where the practice has been implemented, and presentations from Miller Timber Services and Campbell Global on the capabilities and impacts of such equipment.

From the input received by the Forest Practice and full Board Joint Committees, it would appear that the appropriate use of modern, synchronized, tethered logging equipment may result in less environmental impact than traditional tractor or cable operations, but the use of such equipment is not promoted by the Forest Practice Rules, many of which may be overly-restrictive or outdated as well. As a result of this input, the following problem statements have been developed, for the December Joint Committee's consideration, regarding the use of tethered logging equipment in the context of existing Rules:

- 1. Existing Rules related to tractor and cable operations within 14 CCR §§ 914.2 [934.2, 954.2] and 914.3 [934.3, 954.3] do not fully accommodate the use of synchronized tethered logging equipment on steep slopes, the appropriate use of which may have less environmental impact than traditional cable-based operations.**
- 2. The limitations on tractor operations within units which are designated for cable operations are overly prohibitive and restrict tractor operations in areas where little to no environmental impact is likely to occur.**
- 3. Existing language within the Rule sections related to tractor and cable-based operations is outdated and does not reflect modern logging practices.**