



October 4, 2022

California State Board of Forestry and Fire Protection  
P.O. Box 944246  
Sacramento, CA 94244-2460

Re: Board of Forestry and Fire Protection 2022 Regulations and Priority Review

Dear Members of the Board of Forestry,

When the Board approved the tethered operations regulations, it removed the ability of foresters to propose a “cat/cable option” in THPs. This option allowed the use of tractors in cable areas for blind corners, low deflection, and other reasons to get logs to a corridor or skid them to a landing if possible. I have heard from our staff and others that this has been problematic. If the logger finds that a blind corner limits access to downed timber and wants to bring in a cat to get the logs to a corridor or landing the forester must submit a substantial amendment. The definition of substantial amendment specifically calls out changes in yarding method as substantial.

Below you will find potential rule language that addresses the issue and would allow a forester to propose a “cat/cable option” in a THP if explained and justified and approved by the Director.

**Existing Regulation**

**914.2(f)(5), 934.2(f)(5), 954.2(f)(5) Operations [All Districts]**

.....

**(f)** The following limitations apply:

**(5)** Non-Tethered Tractor Operations, excluding Yarding, may occur in areas designated for Cable Yarding on slopes up to 50%. Tethered Operations, excluding Yarding, may occur in areas designated for Cable Yarding. The limitations of 14 CCR § 914.2[934.2, 954.2](a), (b), (c), (d), (e), (f)(2), (g), (h), and (i), and any other applicable limitations on Tractor Operations throughout this Chapter, by District, apply.

**Proposed Changes to Existing Regulations**

**914.2(f)(5), 934.2(f)(5), 954.2(f)(5) Operations [All Districts]**

.....

**(f)** The following limitations apply:

**(5)** Non-Tethered and Tethered Tractor Operations, ~~excluding Yarding~~, may not occur in areas designated for Cable Yarding except to pull trees away from watercourses, to yard logs where deflection is low, to yard blind corners that cannot not be accessed by cable logging alone, to construct firebreaks, for Tethered Tractor Operations to fall timber, and to provide tail-holds. on slopes up to 50%. Tethered Operations, excluding Yarding, may occur in areas designated for Cable Yarding. Such exception(s) shall be explained and justified in the THP, and require Director’s approval. The limitations of 14 CCR § 914.2[934.2, 954.2](a), (b), (c), (d), (e), (f)(2), (g), (h), and (i), and any other applicable limitations on Tractor Operations throughout this Chapter, by District, apply.

**Clean Version of Proposed Changes to Existing Regulations**

914.2(f)(5), 934.2(f)(5), 954.2(f)(5) Operations [All Districts]

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We ask the Board to consider this potential rule change as a high priority as we are currently running into issues in the field and I suspect other landowners are experiencing similar issues.

Sincerely,

A handwritten signature in black ink, appearing to read "John Andersen". The signature is fluid and cursive, with a long horizontal stroke at the end.

John Andersen  
Director, Forest Policy  
Humboldt and Mendocino Redwood Companies