



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Biogeographic Data Branch  
P.O. Box 944209  
Sacramento, CA 94244-2090  
[wildlife.ca.gov](http://wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



October 9, 2023

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

### CNDDDB FEES AND SMALL TIMBERLAND OWNERS

Dear Chair Gilles:

Thank you for submitting comments and inquiries to the California Department of Fish and Wildlife (Department). The Department concurs with the California Board of Forestry and Fire Protection (Board) that high quality data should be available to the public to support forestry projects in California. The California Natural Diversity Database (CNDDDB) houses data that is an important component of timber harvesting review. Accordingly, the Department encourages use of and contribution to the CNDDDB.

The Department recognizes California's forests for their ecological values, as well as for public management, use, and enjoyment. As such, the environmental review process is an essential part of California's sustainable forestry management and conservation goals. California's small timberland owners have a vital role in sustainably managing California's forests and have expressed a need for support related to CNDDDB access. The Department is constrained by what it can do unilaterally to support small timberland owners' need for CNDDDB data but is eager to partner with the Board to find a resolution.

The CNDDDB is a value-added product that compiles extensive and complicated data sources into concise summary records, or element occurrences. CNDDDB also contains a separate database system representing spotted owl observation data. The process for data incorporation into these systems is complex and includes extensive assessments of the data submissions and subsequent spatial and textual representation by trained staff and resource experts before distribution to subscribers. These processes are staff intensive, and per Fish and Game Code Section 1932, subdivision (e), the Department must recoup the costs of updating, operating, and maintaining CNDDDB to ensure its continued resilience and, "[e]nsure cost sharing by all who use the data management system and develop an appropriate schedule of compensation to be paid by

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individuals using the data management system, not to exceed the actual costs for use of the data management system." Ultimately, the licensing fee and accompanying licensing agreement associated with CNDDDB subscription contributes to database function and maintenance and helps maintain the overall integrity of the database as a subscription product.

The Department supports the concept of using the Timber Regulations and Forest Restoration Fund (also known as the AB 1492 Fund), or another funding source, to financially support small timberland owners to access CNDDDB within the Department's established subscription framework. The Department would like to work with CAL FIRE and the Board to review existing processes and evaluate ideas to support small timberland owners. We look forward to continued discussions on these topics. If you have questions about this letter or would like further information, please contact me at (916) 216-1608 or [Carie.Battistone@wildlife.ca.gov](mailto:Carie.Battistone@wildlife.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Carie Battistone".

Carie Battistone, Branch Manager  
Biogeographic Data Branch  
Data and Technology Division

ec: Edith Hannigan, Executive Officer, Board of Forestry and Fire Protection  
Stephen Adams, Deputy Director, Data and Technology Division  
Joshua Grover, Deputy Director, Ecosystem Conservation Division  
Jeff Drongesen, Habitat Conservation Planning Branch Manager  
Isabel Baer, Timberland Conservation and Native Plant Program Manager