



January 17, 2014

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

Re: Road Rules, 2013; 15 Day Notice date January 3, 2014

Dear Chairman Gillless and Board Members,

Campbell Timberland Management on behalf of Hawthorne Timber Company has reviewed the noticed Road Rules, 2013 language changes and finds that they for the most part improve clarity or represent only minor clerical modifications. Our letter to the Board dated October 4, 2013 on the 45-day notice Road Rules, 2013 package specifically requested modifications to 14 CCR 1034(x) regarding mapping considerations. Our recommendation has been carried over to the 15 day notice package on page 69 and we remain supportive of its adoption.

While the 15 day notice adds several additional references in the rule package to Technical Rule Addendum Number 5 (see pages 44, 61 and 62) our recommendation to also provide references to 14 CCR 923.9 (j) and (k) on page 61 related to critical dips and addressing diversion potential has not been included and represents a serious shortcoming given the subject matter specified in the title of the Addendum. We would urge the Board to transmit this information to CAL FIRE so that they can verbally transmit this information regarding these two issues to interested parties during forthcoming training on the Road Rules, 2013 package.

Thank you for the opportunity to comment on the proposed 15 day notice Road Rules, 2013 modifications.

Sincerely,

A handwritten signature in black ink that reads 'Peter F. Ribar'. The signature is written in a cursive style with a horizontal line above the 'i' in 'Ribar'.

Peter F. Ribar
Area Manager