



DEPARTMENT OF FORESTRY AND FIRE PROTECTION

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August 15, 2017

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

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 BOARD OF FORESTRY AND FIRE PROTECTION

Re: RPF and LTO Responsibilities Amendments, 2017

Dear Chairman Gilliss:

The California Department of Forestry and Fire Protection (CAL FIRE) has previously reviewed and provided comments on the proposed regulation language included in the 45-day notice for the *RPF and LTO Responsibilities Amendments, 2017*. As a result of the initial public hearing on this proposal, the Board of Forestry and Fire Protection (Board) revised the proposed text and issued a 15-day notice and Supplemental Statement of Reasons. CAL FIRE has reviewed the revisions presented in the 15-day notice. We do not support the proposal.

We indicated in our previous comments to the Board that we support changes to the regulations that would increase the level and effectiveness of communication between RPFs, LTOs and CAL FIRE in the field during all phases of timber harvesting plan preparation, review and implementation. The stated purpose of the proposed changes to the regulations is, "...to strengthen the interaction between the RPF and LTO." The Board indicates that this interaction, "...is essential to both entities to fulfill their respective responsibilities and work interdependently." The notice additionally states, "...on-site meetings are essential ways the RPF communicates to the LTO regarding how to comply with the plan and the Board rules."

Based on these statements of intent, CAL FIRE does not agree with the Board's new findings, "...that any additional consultation past the required annual on-site visit is up to the RPF's professional discretion whether to utilize future on-site meetings," particularly since there is no requirement for the LTO to participate in these annual on-site visits by the RPF. By striking the language beginning on page 4, line 4 through page 5, line 4 and on page 6, lines 8 through 16; the Board has substantially reduced or eliminated any requirements for the RPF to meet with the LTO on-site to discuss any sensitive on-site conditions requiring special care, including protection of any archaeological or historical sites requiring protection.

Thank you for providing the Department an opportunity to comment on this important rule package. Please consider our previous comments during your deliberations on the proposed regulations. A representative from CAL FIRE will be at the hearing to respond to questions.

Sincerely,

HELGE/ENG
 Deputy Director
 Resource Management