

**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**

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June 10, 2020

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

Re: "LTO Education and Limited LTO" Rulemaking Proposal

Dear Chairman Gillless:

The California Department of Forestry and Fire Protection (CAL FIRE) has reviewed the proposed rule text and both the Initial and Supplemental Statements of Reasons (ISOR and SSOR) for the 45-day Notice of Rulemaking entitled, "LTO [Licensed Timber Operator] Education and Limited LTO." CAL FIRE agrees with the rulemaking purpose expressed as follows in the ISOR and believes the revised rule text achieves this purpose:

The purpose of the proposed action is to: 1) improve the clarity and consistency of the existing regulations surrounding timber operator licenses; 2) limit the activities permitted under a limited timber operator license to avoid excessive risk, given the lack of insurance obligations; 3) more clearly implement those conditional requirements within PRC § 4572; and 4) make the educational requirement of applicants consistent across all types of timber operator licenses.

CAL FIRE Forest Practice Program staff appreciate Board staff's thoughtful work in the construction of the rulemaking documents, and the Management Committee's diligent efforts to move them forward. CAL FIRE fully supports the Board's adoption of Board staff's recommended rule text (Binder Item "FULL 14(c)") as noticed.

Thank you for providing CAL FIRE an opportunity to comment on this important rulemaking proposal. A representative from CAL FIRE will be at the hearing should any questions arise.

Sincerely,

Helge Eng
HELGE ENG
Deputy Director
Resource Management