**Board of Forestry and Fire Protection**

SUPPLEMENTAL STATEMENT OF REASONS

**“Subdivision Map Findings, 2019”**

**Title 14 of the California Code of Regulations (14 CCR),**

**Division 1.5, Chapter 7, Subchapter 1, Article 1**

The Board of Forestry and Fire Protection (Board) intends this Supplement to the Initial Statement of Reasons (ISOR) to reflect changes that have been made to the 45-Day proposed rule text and Initial Statement of Reasons, which was distributed on January 11, 2019.

# SPECIFIC PURPOSE OF EACH ADOPTION, AMENDMENT OR REPEAL (pursuant to GOV § 11346.2(b)(1)) AND THE RATIONALE FOR THE AGENCY’S DETERMINATION THAT EACH ADOPTION, AMENDMENT OR REPEAL IS REASONABLY NECESSARY TO CARRY OUT THE PURPOSE(S) OF THE STATUTE(S) OR OTHER PROVISIONS OF LAW THAT THE ACTION IS IMPLEMENTING, INTERPRETING OR MAKING SPECIFIC AND TO ADDRESS THE PROBLEM FOR WHICH IT IS PROPOSED (pursuant to GOV §§ 11346.2(b)(1) and 11349(a) and 1 CCR § 10(b)).

**Amend § 1266.00 Definitions**

The phrase “The following definitions apply to Title 14 of the California Code of Regulations (14 CCR), Division 1.5, Chapter 7, Subchapter 1, Article 1.” was added to the beginning of this section to clarify the applicability of these definitions. As these definitions may conflict with other definitions in this Chapter or Subchapter, a statement to the effect that these definitions only apply to this specific Subchapter and Article is required.

The definition of “local agency” was deleted because that term is no longer used in this article.

The definition of “State Responsibility Area (SRA)” was revised to cross reference Public Resources Code rather than Government Code. This provides greater clarity and consistency regarding this definition, since Government Code references back to Public Resources Code, and this definition of SRA is used elsewhere in the Board’s regulations.

**Amend § 1266.01 Subdivision Map Findings**

This section was amended to strike out the term “local agency” and replace it with “county.” Upon review of the regulations noticed on January 11, 2019, it was determined that applying these regulations to local agencies, not just counties, was beyond the statutory authority provided by the Legislature. As such, the term “local agency” has been replaced with “county” to conform to statute. In the Initial Statement of Reasons, in the discussion of the specific purpose for adopting a definition of “local agency,” it was stated “…counties do not have “a very high fire hazard severity zone, as…defined in Section 51177” (GC 66474.02(a)).” This is incorrect; there are areas of the state where counties have those very high fire hazard severity zone areas as defined.

**Amend § 1266.02 Reporting the Findings**

This section was amended to strike out the term “local agency” and replace it with “county.” Upon review of the regulations noticed on January 11, 2019, it was determined that applying these regulations to local agencies, not just counties, was beyond the statutory authority provided by the Legislature. As such, the term “local agency” has been replaced with “county” to conform to statute.

This section was also amended to require counties to submit certain information to the Board on a form proscribed by the Board. In the 45-day noticed text, there was no regulatory imperative for local agencies to submit to the Board the form provided for in § 1266.02(d). The revisions to § 1266.02(d)) require counties to submit certain information to the Board when they submit their subdivision maps and associated findings to the Board.