

**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**

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July 14, 2023

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

Re: "Tractor Operations and Cable Yarding Amendments, 2023."

Dear Chair Gilles:

The California Department of Forestry and Fire Protection (CAL FIRE) supports the Board's proposed rulemaking entitled, "Tractor Operations and Cable Yarding Amendments, 2023." As discussed in the Initial Statement of Reasons, the proposed rulemaking would restore the longstanding explicit mechanism for Registered Professional Foresters (RPFs) to propose an exception for use of tractors in areas designated for cable yarding on slopes greater than 50%. The rule provision was removed in the Board's amendment of 14 CCR §§ 914.3(e)[934.3(e), 954.3(e)] in 2020. Since 2021, RPFs who commonly used the former rule provision have sought a clear path to achieve the same allowance for a "tractor/cable option" designation in their harvesting plan submissions. CAL FIRE believes the Board's adoption of this rulemaking proposal is that path.

CAL FIRE agrees that the proposed rulemaking would provide the simplest approach by which RPFs could seek an exception for tractor use in cable yarding areas due to specific circumstances, including insufficient deflection and cable access. The proposed rulemaking would result in regulatory clarity for the regulated and regulator alike.

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

Sincerely,

DocuSigned by:

Matthew Reischman

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MATTHEW REISCHMAN
Deputy Director
Resource Management