

**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**

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July 14, 2023

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

Re: "Maximum Sustained Production Amendments, 2023."

Dear Chair Gillless:

The California Department of Forestry and Fire Protection (CAL FIRE) supports the Board's proposed rulemaking entitled, "Maximum Sustained Production Amendments, 2023." The proposed rulemaking would make modest amendments to the Forest Practice Rules for "Maximum Sustained Production of High Quality Timber Products" (MSP). As proposed, the amended language would add consideration of fire risk and fire protection to the list of possible constraints on timber production. The new language would allow for the inclusion of fire risk and fire protection mitigations as factors that impact the production of high-quality timber products under a Timber Harvesting Plan, Sustained Yield Plan, Nonindustrial Timber Management Plan, or a Working Forest Management Plan.

CAL FIRE believes the proposed rulemaking will add clarity to the Forest Practice Rules for MSP and assist Registered Professional Foresters in their consideration of wildfire resilience as a key element to the management of timberlands. CAL FIRE agrees that fire protection is a forest value that can limit productivity due to management constraints but is needed for long-term protection of overall forest integrity and resilience to wildfire.

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