DEPARTMENT OF FORESTRY AND FIRE PROTECTION
P.O. Box 944246
Sacramento, CA 94244-2460
(916) 217-8647
Website: www.fire.ca.gov

June 16, 2022

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

Re: 45-day Notice of Rulemaking - "Notice of Intent Amendments, 2022"

Dear Chair Gilless:

The California Department of Forestry and Fire Protection (CAL FIRE) supports the Board of Forestry and Fire Protection's (Board) adoption of the proposed rulemaking entitled, "Notice of Intent Amendments, 2022." The modest rule amendments proposed would provide improved clarity and are consistent with the existing Forest Practice Rule standards for a "Notice of Intent to Harvest Timber" (Notice of Intent). As described in the Board's Initial Statement of Reasons, this rulemaking would add the specification that a Notice of Intent require disclosure of all silvicultural methods proposed in a Timber Harvesting Plan (THP) or Program Timber Harvesting Plan (PTHP), including "Special Prescriptions" and "Alternative Prescriptions."

CAL FIRE believes the proposed minor revisions to the Forest Practice Rules would result in improved understanding by the regulated public of what is required for disclosure of silvicultural methods in a Notice of Intent. This improved understanding could in turn reduce the potential for unnecessary THP and PTHP filing returns resulting from inconsistencies in the silvicultural methods disclosed in both the Notice of Intent and the THP or PTHP. This proposal would likewise benefit the interested public through improved disclosure of all the possible silvicultural methods that could be proposed for use in a THP or PTHP, thus allowing for fully informed comment.

The Department appreciates the Board's consideration of this rulemaking proposal and the opportunity to comment. A representative from the Department will be at the hearing should any questions arise.

Sincerely,

DocuSigned by:

Matthew Reischman

09C3EF839A7E418...

MATTHEW REISCHMAN
Deputy Director
Resource Management