

January 17, 2019

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

RE: Definition of fuelbreak

To Whom It May Concern:

The California Licensed Foresters Association (CLFA) is commenting on the definition of "fuelbreak" in 14 CCR 895.1 as it pertains to the Forest Fire Prevention Exemption. The current definition only implies a linear feature that would be directly accessible to fire suppression crews. In order to meet the intent of the exemption to treat large areas for greater fire resilience, we offer the following definition language. "Fuelbreak, pursuant to PRC subsection 4528(e), means an area of modified fuel where a fire may stop or be more easily controlled."

Sincerely,

Harlan Tranmer

Harlan Tranmer, President California Licensed Foresters Association