



DEPARTMENT OF FORESTRY AND FIRE PROTECTION

P.O. Box 944246
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August 15, 2014

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

Re: "Slash Treatments Amendments, 2014"

Dear Chairman Gillless:

The California Department of Forestry and Fire Protection (CAL FIRE) supports the adoption of regulations for the treatment of slash, but recommends the Board consider the alternative language proposed by CAL FIRE presented in Attachment 1. The Governor has declared a state of emergency in regard to the severe drought currently affecting California, and considering that these conditions may continue for years to come, CAL FIRE requests that the Board consider adoption of this alternative language.

The proposed amendment to 14 CCR §§ 917.2(a), 937.2(a), & 957.2(a) will affect slash treatment throughout the state and there may be locations where delaying the required treatment to May 1 would present an inherent risk of wildfire ignition when working in proximity to forest vegetation with extraordinarily low fuel moisture content, particularly in the southern portions of the state. Retention of the existing rule language with a treatment date of April 1 may significantly reduce the risk of wildfires throughout the state, and it would not preclude the plan submitter from proposing an alternative date as provided by 14 CCR §§ 917.2(a)(3), 937.2(a)(3), and 957.2(a)(3). Furthermore, the inclusion of the provision ". . . or within 30 days following climatic access . . ." would provide the timberland owner some flexibility to address varying weather conditions. An additional minor grammatical change to the proposed rule language under 14 CCR §§ 917.2, 937.2, and 957.2 adds the section symbol in front of 895.1.

Please consider adoption of the attached alternative to the proposed slash treatment amendment to diminish this immediate threat to California's residents and wildland resources. A representative from CAL FIRE will be available at the hearing to address any questions you may have.

Sincerely,

A handwritten signature in blue ink, appearing to read "Duane Shintaku".

Duane Shintaku, Deputy Director
California Department of Forestry and Fire Protection

Attachment:

CONSERVATION IS WISE-KEEP CALIFORNIA GREEN AND GOLDEN

PLEASE REMEMBER TO CONSERVE ENERGY. FOR TIPS AND INFORMATION, VISIT "FLEX YOUR POWER" AT WWW.CA.GOV.

**Attachment 1
CAL FIRE's Proposed Alternative Amendments**

“SLASH TREATMENT AMENDMENTS, 2014”

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

Division 1.5, Chapter 4, Subchapters 4, 5, & 6, Article 7

AMEND:

14 CCR §§ 917.2, 937.2, and 957.2 Treatment of Slash to Reduce Fire Hazard

Except in the *[High-Use Subdistrict of the Southern Forest District,]* Southern Subdistrict of the Coast Forest District and Coastal Commission Special Treatment Areas of the Coast Forest District, the following standards shall apply to the treatment of slash created by timber operations within the plan area and on roads adjacent to the plan area, but excluding appurtenant roads. Lopping for fire hazard reduction is defined in 14 CCR § 895.1.

(a) ~~Slash to be treated by piling and burning shall be treated not later than April 1 of the year following its creation, or within 30 days following climatic access, or as justified in the plan as follows:~~

(1) Slash piles created prior to September 1 shall be treated not later than April 1 of the year following its creation, or within 30 days following climatic access after April 1 of the year following its creation.

(2) Slash piles created on or after September 1 shall be treated not later than April 1 of the second year following its creation, or within 30 days following climatic access after April 1 of the second year following its creation.

(3) Alternatives to (1) and/or (2) shall be justified in the plan by the RPF and may be approved by the Director.

(b) Within 100 feet of the edge*****