

## BEATY & ASSOCIATES COMMENTS ON MTHP 15-DAY NOTICE

**From:** Bob Rynearson [BobR@wmbeaty.com]

**Sent:** Friday, December 13, 2013 3:12 PM

**To:** Huff, Eric@CALFIRE

**Cc:** Scott Carnegie

**Subject:** RE: Revised Final Version of 15-day Notice for "MTHP Amendments, 2013"

Hi Eric, I don't plan to testify at the hearing but just my two cents worth on a non-substantive, but much cleaner and clearer wording for the following proposed section:

**(8) Where the THP area is 100 acres or less, new logging road construction is confined to shall not exceed a total of 600 feet in linear distance, and a logging road construction and reconstruction combined shall not exceed 1,000 feet foot limit total of road construction and reconstruction combined. Where the THP area is between 101 acres and 160 acres, new logging road construction shall not exceed a total of 960 feet in linear distance, and logging road construction and reconstruction combined shall not exceed 1,600 feet in linear distance.**

So as to make the sentence simpler and so as not to exclude parcels that are greater than 100 acres but less than 101 acres (e.g. 100.5 acres) and ¼ sections that are slightly greater than 160 acres (e.g. 161 acres) why not just word 2<sup>nd</sup> sentence to read: **"Where a THP area is greater than 100 acres, new logging road construction shall not exceed....."**? There is no need for the long, awkward wording that would be necessary to put a limit on upper end since this section is already limited by the definition of what ownerships qualify for MTHP i.e. 160 acres or ¼ section and less. So with this change I think you more clearly meet the intent and do not leave open the question of "what about ¼ section that is 160.2 acres" or "what about parcel that is 160.5 acres?"

Best Regards,

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Hi Eric,

For Section 1051(a)(5):

Consider replacing "one hundred feet (100')" with "100 feet".

This style would then be consistent with the linear distance style used in section 1051(a)(8).

Scott Carnegie