

Hannigan, Edith@BOF

From: Elder, Travis <Travis.Elder@sdcounty.ca.gov>
Sent: Wednesday, May 04, 2016 4:29 PM
To: Hannigan, Edith@BOF
Cc: Ledford, Thomas; Vigil, Domingo; County Ag Commissioner, San Diego@CDPR; Moore, Megan; Yeane, Priscilla; Holt, Dave; Kahler, David
Subject: RE: SRA FPF Grant Comment Letter Clarifications

Hi Ms. Hannigan,

Our responses to your comments are below:

Comment L4-4 Response: We agree that both Sections clearly define what type of projects are eligible and which are not, however, Section 1666.5 lists project types that would not qualify, but does not clearly state that an Eligible Applicant (1666.3) seeking grant funding for any of the project types within this section would not be eligible for funding under the SRAFPF Grant Program.

We request that clarification of this be provided in an opening sentence prior to (a) in Section 1666.5, or a definition provided in the Definition section that clearly states that project types listed in section 1666.5 are not eligible for funding and would not fall under an 'other' qualifying project either.

Comment L4- 10 Response: As outlined, DPR maintains labor contracts with individual Cal Fire Conservation Camps in the County. These services are critical to the manual fuel/vegetation modification in our parks and open space lands. The concern is that the availability of Cal Fire conservation crews may be limited due to the demand for their service related to the proposed rulemaking.

Comment L4-13 Response: We feel the answer by the Board is sufficient and that a grant application can be submitted for different projects throughout the County within the SRAs.

Please let me know if I can be of additional assistance, and thank you for all of your efforts.

Kind Regards,

Travis Elder

Deputy Agricultural Commissioner

San Diego County Department of Agriculture, Weights and Measures

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From: Hannigan, Edith@BOF [<mailto:edith.hannigan@bof.ca.gov>]

Sent: Monday, May 2, 2016 7:16 PM

To: Elder, Travis <Travis.Elder@sdcounty.ca.gov>

Subject: SRA FPF Grant Comment Letter Clarifications

Dear Mr. Elder,

I am drafting the Board of Forestry and Fire Protection responses to Mr. Dang's letter dated May 2, 2016, regarding the proposed SRA Fire Prevention Fund regulations (attached). There are three comments I'd like to get further clarification on before I present this to the Board for their review at their upcoming hearing on May 12. Please review the below comments and responses and provide any further information you feel would be helpful. I need your response by **close of business on Wednesday, May 4**, for inclusion in their rulemaking package.

I've attached the proposed regulatory text, 45 day notice, and Initial Statement of Reasons for your reference.

Thank you,
Edith Hannigan

Comment L4-4: Ha Dang, Agricultural Commissioner, San Diego County

2. Clarify the following items in the proposed Section 1666.1 Definition section:
d. The difference between qualifying and non-qualifying projects.

Board Response:

Qualifying projects are described in § 1666.4, page 9 of the 45 noticed rule text, and non-qualifying projects are described in § 1666.5 on page 11 of the 45 noticed rule text. Without more information about how or why the difference between qualifying and non-qualifying projects is unclear to the letter writer, the Board cannot provide any further clarifying information.

Rule Text Edit: No

Comment L4-10: Ha Dang, Agricultural Commissioner, San Diego County

3. San Diego County Department of Parks and Recreation (County Parks) currently has several active labor contracts with CAL FIRE for vegetation management and fuel reduction both inside and outside of SRA areas to maintain park lands. We would like to continue to contract with individual Cal Fire [sic] camps for this service.

Board Response:

This proposed rulemaking would not affect contracts such as the one the letter writer described. If the letter writer could be more specific about how they believe this proposed rulemaking may affect these contracts, the Board would respond to their concerns more specifically.

Rule Text Edit: No

Comment L4-13: Ha Dang, Agricultural Commissioner, San Diego County

5. Allow an agency to submit more than one grant proposal for fuel reduction projects in different areas of the County. Allow for better coordination and continuity of fuels projects across local jurisdictional boundaries (fire agencies, fire safe councils, etc...)

Board Response:

The Board is unaware of any limitation on the number of grant proposals that may be submitted by any one agency. If the letter writer would direct the Board to the specific language they believe limits agencies to one proposal, the Board could respond to this concern more specifically and make rule text changes as appropriate.

The Board believes there are many opportunities in this grant proposal process to demonstrate coordination across jurisdictional boundaries and awards *more* points to proposed projects that demonstrate such cooperation and coordination (see § 1666.16(c)(1), (3), (6)(B), page 32 through 34 of the 45 day noticed rule text).

Rule Text Edit: No

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