



## DEPARTMENT OF FORESTRY AND FIRE PROTECTION

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August 14, 2017

Keith Gillless, Chair  
State Board of Forestry and Fire Protection  
P. O. Box 944246  
Sacramento, California 94244-2460

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BOARD OF FORESTRY AND FIRE PROTECTION

**RE: 15-DAY NOTICE OF PROPOSED RULEMAKING, "WORKING FOREST MANAGEMENT PLAN."**

Dear Chairman Gillless:

The California Department of Forestry and Fire Protection (CAL FIRE) has reviewed the proposed rule text and Supplemental Statement of Reasons for the 15-day Notice of Proposed Rulemaking entitled, "Working Forest Management Plan." As indicated in the Supplemental Statement of Reasons, modification of the rule provision for recirculation of significant new information in 14 CCR §1094.16(d)(6) is intended to improve clarity for the benefit of the regulated public. This rulemaking is also responsive to the Office of Administrative Law's rationale for disapproval of the originally adopted rule language for this section.

CAL FIRE supports Board adoption of the revised rule text proposed in the 15-day Notice of Rulemaking. As proposed, the revised rule text clarifies the process by which a "Notice of Recirculation" for a Working Forest Management Plan under CAL FIRE review is prepared and distributed. The revised text clearly specifies that a Notice of Recirculation is to be equivalent to a "Notice of Filing" as described in 14 CCR §1094.15.

Thank you for providing an opportunity to comment on this rulemaking proposal. A representative of CAL FIRE will be present at the hearing to respond to questions or comments.

Sincerely,

HELGE ENG  
Deputy Director  
Resource Management