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September 29, 2014

Board of Forestry and Fire Protection
Attn: Kevin Conway
Staff Forester
P.O. Box 944246
Sacramento, CA. 94244-2460

RE: "Forest Fire Prevention Pilot Project Exemption, 2014" Proposed Rulemaking

Dear Members of the Board,

Michigan-California Timber Company (MCTC), managers of approximately 115,000 acres of timberland in northern California, submits the following comments for consideration by the Board of Forestry and Fire Protection (BOF) in regard to the rulemaking package "Forest Fire Prevention Pilot Project Exemption, 2014" (rule package).

MCTC supports the rule package as it appears in the 15-Day Notice published September 12, 2014. Our initial assessment of the rule language indicates that the newly created subsection (j) will be more feasible to implement on the timberlands we manage due to the change in the stump diameter limitations adopted by the Legislature in AB744. The proposed changes to the slash height requirements from 9 to 18 inches are even more significant in terms of our ability to use the proposed exemption on our timberlands since we were unable to use the "LaMalfa Exemption (14 CCR 1038(i)) on our timberlands primarily due to the 9-inch slash height requirement immediately upon completion of timber operations. The proposed 18-inch slash height requirement will likely make this exemption feasible for use on portions of our timberlands and appears to be a reasonable balance between achieving "fuel hazard nirvana" (which also has environmental consequences) and providing for economically feasible fuel hazard reduction efforts.

Thank you for considering our comments. We are appreciative of the efforts of Staff to put this rule package together in a relatively short timeframe so that it would be available to landowners in 2015.

Sincerely,

Chris Quirnbach
Lead Planning Forester
RPF #2623