



20 October 2006

Board of Forestry and Fire Protection
Attn: Christopher Zimny
Regulations Coordinator
P.O. Box 944246
Sacramento, CA 94244-2460

Re: 15 Day Notice Road Management Plan 2006

Dear Mr. Chairman and Board Members:

We urge adoption of the road management plan (RMP) regulations as embodied in the 15 – Day Notice language for the Public Hearing on November 8, 2006. We support the rule package for the several reasons because a RMP:

Is optional

The development of a road management plan will take time and expense. The benefits to the landowner associated with its use must be weighed against such costs.

Is flexible

It can be as complex and comprehensive as the landowner desires. The proposed regulations take a performance-based approach. Individual RMPs, however will likely incorporate a mixture of performance-based and prescriptive measures.

Facilitates disclosure and standardized practices

Will provide additional information related to the transportation system by addressing multiple planning watersheds within ownership blocks.

Specifies a standardized framework aiding development and review

Establishes “side-boards” for content which should facilitate development and review. Applicants who have submitted “Option A” analysis to achieve compliance with 14CCR913.11 Maximum Sustained Production of High Quality Timber Products understand that THP approval timeframes will need to be extended to facilitate review and subsequent approval. An additional 10 days has been added to allow the Director time to determine whether a THP with an RMP can be filed. The notice of filing (public notice) is also required to indicate whether a RMP has been submitted with a plan. All other THP review processes remain unchanged.

Will be a living document, subject to improvement and updating

Because a RMP is appended to a THP it can be up-dated with additional information or changes in the initially approved THP or subsequent THPs. The package correctly allows updating of road inventories over time. The majority of landowners do not currently have ownership-wide up-to-date inventories. The RMP rules incorporate verification and adaptive management elements that provide a feedback loop used to update or modify an RMP.

Can be utilized as the foundational document to potentially satisfy other requirements

Landowners may use the RMP to help satisfy other requirements under different authorities. Such requirements may include:

- watershed-wide or property specific regional water board waste discharge requirements
- TMDL compliance
- Department of Fish and Game (DFG) programmatic streambed alteration permits for road maintenance
- DFG 2112 issuance.

Approved THPs are often used by these agencies to fulfill CEQA requirements.

The Board over the past five years has worked to develop optional approaches to address sediment concerns as they relate to fisheries and the beneficial uses of water.

Unfortunately, these past efforts have not resulted in an operational set of rules. The adoption by the Board of the Road Management Plan, 2006 rules will be a positive step forward in this regard. Therefore we urge your adoption.

Thank you for the opportunity to comment on this rule package.

Sincerely,



Peter F. Ribar
Resource Manager