



RURAL COUNTY REPRESENTATIVES  
OF CALIFORNIA

March 18, 2016

Mr. J. Keith Gilles, Chair  
California Board of Forestry & Fire Protection  
1416 9th Street, Room 1506-16  
Sacramento, CA 95814

**RE: Drought Mortality Amendments, 2015**

Dear Chair Gilles:

The Rural County Representatives of California (RCRC) is an association of thirty-five rural California counties and the RCRC Board of Directors is comprised of elected supervisors from each of those member counties. RCRC welcomes this opportunity to provide comment on the proposed Drought Mortality Amendments, 2015 (Amendments), and offers our support for the California Board of Forestry & Fire Protection's (Board) adoption of the regulations.

RCRC member counties are among those experiencing the highest levels of tree mortality due to extreme drought conditions, and four of the six counties designated as high hazard zones by the State are RCRC members. The tree mortality emergency is not just a wildfire issue, but also a public health and safety issue that must be addressed with a sense of urgency by all forest land managers. While the State is moving swiftly to address dead and dying trees due to invasive pests on State Responsibility Area lands and working with the USDA Forest Service to mitigate the impacts on national forest lands, the proposed extension of the exemptions to the Z'berg-Nejedly Forest Practice Act (FPA) is vital so that private landowners can continue to address the impacted trees at an appropriate pace and scale. We also feel the extension to December 2018 is warranted in light of the scale of the mortality problem, as we are already seeing the infestation spreading well beyond the high hazard zones into the rest of the State.

RCRC believes this proposal is an important component of the State's response to the tree mortality crisis, and plays a vital role in carrying out the directives established in the Governor's October 2015 Tree Mortality Emergency Proclamation.

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We appreciate the Board's consideration of our comments, and would be happy to discuss them further. If you should have any questions, please contact me at (916) 447-4806 or [sheaton@rcrcnet.org](mailto:sheaton@rcrcnet.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Staci Heaton", with a large, sweeping flourish at the end.

STACI HEATON  
Regulatory Affairs Advocate

cc: Members of the California Board of Forestry and Fire Protection  
Matt Dias, California Board of Forestry and Fire Protection  
RCRC Board of Directors