











2. IFPL shutdown reforms:
  - ✓ IFPL 2 Change: Rotary saw operate only before 1pm
  - ✓ IFPL 3 Change: Cable/motorized carriage operate before 1pm
  - ✓ IFPL 3 Change: Feller bunchers (non-rotary) operate only before 1pm, with added fireline-capable machine available on-site
  - ✓ IFPL 3 Change: Rotary saws operate only before 1pm, with added observer and fireline-capable machine available on-site
  - ✓ IFPL 3 Change: Power saws operate before 1pm on ground-based operations with added fireline-capable machine
  - ✓ Eastside IFPL applicable to federal only (as current)
  
3. ODF field administration upgrades:
  - ✓ Waiver administration standardized & bolstered
  - ✓ Small landowner/operator interaction bettered
  - ✓ Pocket-size rule booklet to be published
  - ✓ Clarify & communicate industrial vs. public rules
  - ✓ Electronic information enhanced
  - ✓ Fire cause reporting improved

#### D. AOL Recommendations to Implement Program Updates

While AOL supports the Department's proposed updates to industrial fire protection program—we urge the following recommendations to implement the comprehensive three components:

5. Conduct OAR rulemaking to update proposed industrial fire prevention rules for the 2017 fire season
6. Approve, publish, and implement proposed IFPL shutdown regulation changes in Oregon's ODF-protected forests for the 2017 fire season. ODF-protected forests comprise 90% of industrial operations in OR; begin coordinating IFPL changes with the federal Pacific NW Coordinating Group; but, implement in Oregon in 2017.
7. Initiate negotiations about proposed IFPL changes with the federal Pacific NW Coordinating Group; seeking NW region-wide proposed IFPL changes for the 2018 fire season.
8. Implement ODF field administration proposed upgrades, publish, and apply changes to the field operations in Oregon's ODF-protected forests for the 2017 fire season.

In conclusion, I make the above recommendations in respect for the Department's decades-long commitment to Oregon's complete & coordinated fire protection program, which evolved in the spirit of cooperative stewardship with the Department's and Board's advisory committees and forest cooperators. An effective industrial fire prevention program can be assured where sound practices are willingly employed by Oregon's forest operators and landowners.

Thank you for considering our support and suggestions toward the Department's 2017 industrial fire prevention program. I look forward to participating in implementing the updates proposed by the Industrial Fire Rule Committee, to be enacted and implement in the field during 2017 and 2018 by ODF and the forest cooperators.