

**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**

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April 25, 2022

Dr. Keith Gillless, Chairman  
State Board of Forestry and Fire Protection  
P. O. Box 944246  
Sacramento, CA 94244-2460

**Re: "Meadows and Wet Areas, and Cutover Land Amendments, 2021" rulemaking proposal.**

Dear Chair Gillless:

The California Department of Forestry and Fire Protection (CAL FIRE) supports the Board of Forestry and Fire Protection's (Board) adoption of the proposed rulemaking entitled, "Meadows and Wet Areas, and Cutover Land Amendments, 2021." The proposed rulemaking would provide consistency and clarity in the definitions for "Meadows and Wet Areas," and "Wet Meadows and Other Wet Areas." It would also remove the inadvertent persistence of references to "Cutover Land" in the rules. By combining the definitions of "Meadows and Wet Areas" for the Northern and Southern Forest Districts, which are identical, and applying the same definition to all Forest Districts, consistency in application of the definitions will be achieved for the benefit of the regulated public statewide.

The proposed rulemaking would align terms used in the Forest Practice Rules with existing definitions and result in regulations that more accurately reflect those definitions. CAL FIRE supports continued application of the current definitions for "Meadows and Wet Areas," and "Meadows and Other Wet Areas" because they are well-understood by the regulated public and Review Team agencies, and result in consistent protection of these features in harvesting plans. To date, there has been no evidence presented in the Board's Management Committee discussions of this topic that would indicate these features on the landscape are not being afforded adequate protection under the existing rules. CAL FIRE also endorses the minor revision of terms in the Aspen, Meadows, and Wet Areas Restoration special prescription and High Use Subdistrict rules. These revisions, however modest, would result in improved clarity and comprehension.

As is indicated in the Initial Statement of Reasons, the benefit of this rulemaking is improved clarity and consistency, and accurate reflection of terms defined by the Forest Practice Rules. There is no other problem to solve or purpose to achieve.

Thank you for the opportunity to comment on this rulemaking proposal and offer our support for its adoption by the Board. A representative from CAL FIRE will be at the hearing should any questions arise.

Sincerely,

DocuSigned by:

Matthew Reischman

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MATTHEW REISCHMAN

Deputy Director

Resource Management