

**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**

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July 14, 2023

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

**Re: "Ford Definition Amendment, 2023."**

Dear Chair Gilles:

The California Department of Forestry and Fire Protection (CAL FIRE) supports the Board's proposed rulemaking entitled, "Ford Definition Amendment, 2023." The proposed rulemaking was initiated by the North Coast Regional Water Quality Control Board (North Coast Board) and would amend the existing Forest Practice Rule definition of the watercourse crossing type known as a "Ford." As proposed, the definition would be modified to include four specific descriptions of the composition of a ford-style crossing. The proposed language also includes an important acknowledgement that the four descriptions are not inclusive of all possible variants of a ford crossing.

CAL FIRE has not been able to corroborate through correspondence with Unit Foresters that the absence of additional crossing descriptors has resulted in confusion during Preharvest Inspections or the plan review process generally. Review of existing and proposed watercourse crossings commonly features prominently in harvest plan review. Whether review of the proposed composition of a ford-style crossing takes any more time than that of a culvert crossing cannot be discerned. Still, clarity in the Forest Practice Rule definitions of terms can be helpful and the four types of ford crossings described can serve as a guidepost for Registered Professional Foresters in their development of harvest plans. For these reasons, CAL FIRE supports the Board's adoption of this proposed rulemaking.

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