



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



April 28, 2025

Terrence O'Brien
Chair
California Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

FOREST PRACTICE RULE PLEAD FOR FUELS MANAGEMENT IN WATERCOURSE AND LAKE PROTECTION ZONES

Dear Chair O'Brien:

California Department of Fish and Wildlife (CDFW) has reviewed the Board of Forestry and Fire Protection's (Board) rule plead proposing changes to the California Forest Practice Rules (Rules) relating to fuels management in the Watercourse and Lake Protection Zone (WLPZ) (Cal. Code Regs., tit. 14 § 916 et. seq.). The following comments regarding this rule plead reflect CDFW's verbal comments at prior Forest Practice Committee and Board meetings.

CDFW supports the goals of this rule plead. Fire exclusion, climate change, and the replacement of diverse, mature stands with young, even-aged stands have significantly raised the risks of catastrophic fires throughout California's forested landscapes. Riparian zones are not immune to this trend. Active management of riparian areas that mimic historical fire patterns can help restore the ecological health of California's riparian zones and watercourses and lower the probability of high-severity fires in these sensitive areas.

Throughout the rulemaking process, CDFW has worked closely with the Forest Practice Committee and Board staff to balance the need for efficient fuels management in the WLPZ while maintaining protection for the beneficial functions of aquatic and riparian habitats. Those conversations resulted in a rule plead that keeps the bulk of the tree retention standards of the existing WLPZ rules, while allowing heavy equipment within the WLPZ where there is a demonstrable need for fuels reductions.

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This rule plead represents a shift in how timber operations in the WLPZ are conducted. In previous discussions, CDFW requested to include a formal monitoring requirement within the regulations. This was not included, in part, because there were concerns about Review Team Agencies' ability to fulfill this obligation given current staffing levels and workloads.

If CAL FIRE's annual reporting (916.13(j) in the draft Rule) indicates significant use of this new rule, CDFW may request that the Board revisit these rules to determine if they need further restriction or expansion. At that time CDFW may again request a formal monitoring program.

In the meantime, CDFW is committed to tracking the results of these projects in a systematic manner, in collaboration with the other Review Team Agencies, whenever possible. These operations are meant to lower the risk of high-intensity fire in riparian stands. This means that the focus of fuels treatments should be the removal of fine surface and ladder fuels while large fire-resistant trees and riparian elements that contribute to cool, moist microclimates are maintained. Careful observation of the outcomes and impacts of these operations will be necessary to understand if the goal of these rules has been met.

CDFW thanks the Board for the opportunity to comment and the Forest Practice Committee for facilitating a highly collaborative process in refining this draft Rule. If you have questions, please contact Elliot Chasin at (916) 206-0384 or TimberFireHQ@wildlife.ca.gov.

Sincerely,

DocuSigned by:


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cc: Joshua Grover
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