

**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**

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July 9, 2025

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

**Re: Rulemaking entitled, "Vegetation Treatment in the Watercourse & Lake Protection Zone."**

Dear Chair O'Brien:

The California Department of Forestry and Fire Protection (CAL FIRE) supports the Board's proposed rulemaking entitled, "Vegetation Treatment in the Watercourse & Lake Protection Zone." As discussed in the Initial Statement of Reasons, high intensity fires within a Watercourse and Lake Protection Zone (WLPZ) can result in increased erosion rates, lowered water quality and channel instability. These results from wildfire can negate the benefits riparian forest stands provide for water, fish, and wildlife. Allowing vegetative treatments in the WLPZ as part of fuelbreak creation and maintenance could potentially make a fuelbreak more effective for fire suppression actions and lower the impacts of wildfire.

The Forest Practice Committee's deliberations in the development of this rulemaking proposal have been thorough and inclusive of contemporary research findings and divergent perspectives. The rulemaking provides balanced and appropriate avenues for landowners to continue in their efforts to reduce hazardous fuels, thin forests, and manage their lands for their personal benefit, and for the maintenance of public trust resources.

CAL FIRE appreciates the continued efforts by the Board to address critical wildfire fuels treatment conditions across the landscapes of California. Thank you for the opportunity to comment on this important rulemaking.

Sincerely,

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**ERIC K. HUFF, RPF No. 2544**  
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Forest Practice