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Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460
Attn: Forest Practice Committee

Re: Vegetation and Fuels Treatments in Watercourse and Lake Protection Zones (WLPZ)

Dear Chairman Wade,

During the January 2024 Forest Practice Committee meeting, specific to the discussion of Vegetation and Fuels Treatment in the WLPZ, several questions were asked of Green Diamond relative to experimental riparian treatment prescriptions permitted and implemented on the timberlands. Below you will find Green Diamond's responses to the specific questions asked by the committee and further clarification related to our experimental riparian treatment prescriptions.

To address the question from Chair Wade regarding the regulatory pathway allowing for experimentation in the Watercourse and Lake Protection Zones:

Experimental riparian treatment prescriptions were permitted under Green Diamond's Experimental Watersheds Program as defined in the Aquatic Habitat Conservation Plan and Candidate Conservation Agreement with Assurances (AHCP; 2006), with concurrence from the National Marine Fisheries Service (NMFS) and U.S. Fish and Wildlife Service (USFWS). Experimental riparian treatment prescriptions were not originally contemplated as activities that would be permitted under the California Forest Practice Rules. However, at the request of CAL FIRE staff, Green Diamond agreed to utilize 14 CCR 916.9(v) for the first two timber harvest plans (THP) associated with the Experimental Watersheds Program to better understand the utility of the section V rule, despite exemption from said rules under the AHCP.

All Forest Practice Rules and AHCP protection measures for watercourse and lake protection zones were implemented in both THPs, excepting canopy retention requirements and directional felling toward the watercourse to accelerate large wood

recruitment. Specifically, the Forest Practice Rules and AHCP measure modifications to accommodate the experiments were as follows:

- 914.1 (a) – Falling trees across the watercourse.
- 916.3 (a) – Deposition of slash and debris into watercourse resulting from falling trees across the watercourse.
- 916.3 (e) – Falling trees across the watercourse.
- AHCP Section 6.2.5.4 – Obtained concurrence from NMFS and USFWS to reduce overstory canopy levels below standard prescription in association with this experimental watershed project.
- AHCP Section 6.2.1.2.1 – Reduce the standard canopy level of inner and outer Class I zone to 50% overstory canopy closure.
- In the second harvest unit we also added 916.5 (e)(D) & (E) to allow flexibility in achieving target canopy thresholds.

Through this process, the company learned that 14 CCR 916.9(v) likely does provide a regulatory pathway to improve resilience to fire; however, the arduous nature of the rule package is an obstacle most landowners are not likely to overcome. The utilization of this rule section, as written, may not contribute to accelerating the number of acres treated for the purposes of fuels reduction and forest resilience.

To address the question from member Jani regarding our slash management and specific harvesting practices in the WLPZ:

Experimental riparian treatment prescriptions were designed to evaluate physical and biological responses to canopy manipulation; thus, treatment of logging slash resulting from harvest activities was not specifically addressed in the context of fuels reduction. Provisions were written into the THPs to require removal of treetops and debris below the watercourse transition line (WTL) immediately by hand or in conjunction with yarding operations. At some sites, allowances were made to leave boles (stems) of trees in place below the WTL if they were spanning the watercourse and not impeding flow or representing diversion potential. Allowances were made for logging slash to be used to treat areas of ground disturbance that could deliver sediment to a watercourse.

To address the question from Board Staff regarding logging operations and post-harvest basal area measurements:

All operations were conducted via cable logging systems and the trees were felled by hand. In most cases, only one side of the watercourse was treated. One project allowed for treatment areas on both sides of the watercourse. No ground-based operations were conducted in the WLPZ.

The WLPZ areas were identified as selection silviculture areas in the THPs, with a post-harvest conifer stocking requirement of 75 sq. ft. of basal area per acre. We collaborated with CDFW on a study to evaluate experimental thinning treatments on the long-term development of large diameter trees and deadwood using a forest growth model. The initial baseline data was collected preharvest in 2016. We are currently collaborating with a Cal Poly Humboldt graduate student to collect data for 5 years post-treatment, and that project is anticipated to be concluded at the end of 2024.

Green Diamond has been actively researching riparian treatment prescriptions since the early 2000s, when we began our collaboration with Dr. Peggy Wilzbach (Aquatic Ecologist with Cal Poly Humboldt and U.S. Geological Survey) and Dr. Bret Harvey (Fisheries Biologist with Cal Poly Humboldt and U.S. Forest Service) on their study that investigated the effects of riparian canopy openings and nutrient additions on the growth and abundance of trout. Over the past two decades, Green Diamond's partnerships on this research have included state and federal agencies, universities, academic and professional experts including USFWS, NFMS, USFS, USGS, OSU, HSU, WSU, CDFW, CalFire, NCRWQCB, RNP, WDFW, the Board's Effectiveness Monitoring Committee, and private consultants.

At the discretion and request of the Forest Practice Committee, Green Diamond's conservation science team is available for a more thorough presentation of our research related to this topic at a future meeting. It would be our privilege to engage with the State Board of Forestry and Fire Protection to share what we have learned about experimental riparian treatment prescriptions in the context of both environmental permitting options and the associated risks/benefits to this critical ecosystem.

Sincerely,



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