

**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**

P.O. Box 944246  
Sacramento, CA 94244-2460  
(916) 212-6451  
Website: [www.fire.ca.gov](http://www.fire.ca.gov)



July 14, 2023

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

**Re: "Coastal Commission Special Treatment Areas Silviculture Amendments, 2023."**

Dear Chair Gillless:

The California Department of Forestry and Fire Protection (CAL FIRE) supports the Board's proposed rulemaking entitled, "Coastal Commission Special Treatment Areas Silviculture Amendments, 2023." CAL FIRE has consistently participated in the Management Committee's deliberations on this proposed rulemaking, including the field workshop hosted by the Humboldt-Del Norte Unit. We appreciate the Board Members' and staff's efforts to collaborate with the Coastal Commission in the interest of wildfire resilience in the Coastal Zone. This proposed rulemaking, though modest, is a significant step forward that could result in more resilient landscapes and improved protection of life and property.

The proposed rulemaking removes the exclusion of the Coastal Commission Special Treatment Areas (CCSTA) of the Coast Forest District from the standards for treatment of slash created by timber operations within the plan area, near approved and legally permitted structures and on adjacent roads within the Coastal Zone. The purpose of this amendment is to require treatment of slash through chipping, burning, or removal from the site, along roads and near legally permitted structures to aid in firefighting efforts and the protection of lives and property. Additional changes remove the requirements that leave trees be "Countable Trees", that 50% percent of trees with a diameter at breast height (DBH) of 12-18 inches remain after thinning, and that the remaining canopy cover for leave trees be greater than 50%. It also removes a description for the measurement of DBH that conflicts with the term as defined in Forest Practice Rule Section 895.

The proposed rulemaking would also allow for the use of the following silviculture methods in the CCSTA that were previously not allowed: Fuelbreak/Defensible Space, Variable Retention, and Alternative Prescription. Proposed companion amendments include modification of the stocking requirements for the CCSTA to reflect the standards in Section 912.7 for the Coast Forest District and Section 952.7 in the Southern Forest District. These proposed amendments are based on advances in the quality of seedstock, knowledge of tree seedling survival, and the implications of stand density on drought and pathogen mortality, and high intensity wildfire. Lastly, the proposed rulemaking would remove the prohibition of broadcast burning on lands harvested under the commercial thinning and selection silvicultural methods in the CCSTA, providing more options for vegetative fuels management.

CAL FIRE believes the proposed rulemaking could result in improved resilience of California forests to the increasing risks of wildfire and climate change by allowing for fuel treatments and more silviculture options for timberland owners. Additionally, CAL FIRE concurs that the proposed revised and added management options will ultimately have a positive effect on the aesthetic qualities of the harvest areas in the CCSTA along with improving the resilience of forests. The Department likewise supports the Board's continued partnership with the Coastal Commission for the purpose of further improving opportunities for creation of wildfire resilient timberlands under shared jurisdiction.

Thank you for providing the Department an opportunity to comment on this important rule package. A representative from CAL FIRE will be at the hearing should any questions arise.

Sincerely,

DocuSigned by:



09C3EF839A7E418...

**MATTHEW REISCHMAN**

Deputy Director

Resource Management