



State Water Resources Control Board

January 13, 2025

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

Re: Watercourse Crossings and Emergency Notice Watercourse Crossing
Requirements, 2025,
Title 14 of the California Code of Regulations

Dear Members of the Board of Forestry and Fire Protection,

The State Water Resources Control Board and Regional Water Quality Control Boards (collectively the Water Boards) support the approval of the Board of Forestry and Fire Protection's (Board of Forestry) proposed rulemaking entitled "Watercourse Crossings and Emergency Notice Watercourse Crossing Requirements, 2025."

The Water Boards appreciates the Board of Forestry's efforts to address watercourse crossings under Exemptions and Emergency Notices in the Anadromous Salmonid Protections Rules, as well as construction and reconstruction standards in Emergency Notices under the Forest Practice Rules. These issues, which we highlighted in our October 14, 2022 letter, are critical for improving sediment management in forested areas. We appreciate the opportunity to provide input during the review process, working collaboratively with the Board of Forestry, their staff, and others, including California Department of Forestry and Fire Protection, the California Department of Fish and Game, the California Geological Survey, and members of the public.

The Initial Statement of Reasons highlights the key issue: watercourse crossings are the most significant source of human-caused sediment delivery to waters. The existing rule text lacks clarity, creating potential disparities in protection under Exemptions and Emergency Notices versus standard rules. The proposed rule revisions address this issue by providing clear and consistent regulatory standards for watercourse crossings under the Anadromous Salmonid Protections rules and better ensure construction and reconstruction of watercourse crossings under Emergency Notices comply with the Forest Practice Rules.

E. JOAQUIN ESQUIVEL, CHAIR | ERIC OPPENHEIMER, EXECUTIVE DIRECTOR

We believe that this rule revision provides substantial improvement to the current rules and look forward to future discussion to address Significant Existing or Potential Erosion Sites on Emergency Notices.

Thank you for providing this opportunity for the Water Boards to comment on the proposed rule package.

Sincerely,

A handwritten signature in blue ink that reads "Nick Martarano". The signature is fluid and cursive, with a large loop at the end of the last name.

Nick Martarano, Assistant Deputy Director
Division of Water Quality, State Water Resources Control Board

CC:

Paul Hann, Watersheds and Wetlands Section Lead, Division of Water Quality

Michael Hanks, Forestry and Wildfire Resiliency Unit, Division of Water Quality

Dave Fowler, Engineering Geologist, North Coast Regional Water Quality Control Board

Jonathan Meurer, Engineering Geologist, Central Valley Regional Water Quality Control Board