



California Natural Resources Agency
DEPARTMENT OF FISH AND GAME
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ARNOLD SCHWARZENEGGER, Governor
John McCamman, Director



January 19, 2010

Mr. George Gentry, Executive Officer
Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

Subject: Road Rules Committee review of measures for mitigating sediment impacts of roads, landings and watercourse crossings in watersheds with anadromous salmonids

Dear Mr. Gentry:

The Board of Forestry and Fire Protection's (Board) letter dated December 17, 2009 requested initial input from agencies regarding rulemaking for roads, landings and watercourse crossings. The Department of Fish and Game (DFG) appreciates the opportunity to provide this input for consideration by the Board's Forest Practice Committee (Committee) and Road Rules Task Force subcommittee (Task Force).

When the Board approved the new Anadromous Salmonid Protection Rules in October 2009, it committed to review the adequacy of road, landings and watercourse crossings measures in watersheds where the Anadromous Salmonid Protection (ASP) rules apply and to conduct such a review in 2010. In recent meetings of the Committee, Committee members have raised concerns about being able to undertake such a review at the same time as it considers a proposal from the Board's Task Force dealing with reorganization of all existing roads related rules now contained in the Forest Practice Rules.

As discussed at the January 5, 2010 Committee meeting DFG supports the Committee reviewing the Task Force's current proposal. This proposal incorporates reorganization of the existing road provisions of the new ASP rules. DFG believes that public review and discussion of this proposal can begin immediately in the Committee, while the Task Force turns its attention to reviewing the adequacy of road measures in ASP watersheds. DFG supports the Task Force as an appropriate forum for this review and will participate. This would free the Committee's time to expedite review of the Task Force's reorganization proposal without sacrificing the Board's larger commitment to completing rulemaking for ASP watersheds.

In regards to reviewing the adequacy of roads measures in ASP watersheds, DFG recommends that the subcommittee undertake a comparison of the existing roads rules and the measures contained in Title 14, California Code of Regulations section 923.9.2. These measures have been found to be feasible and adequate for mitigating sediment

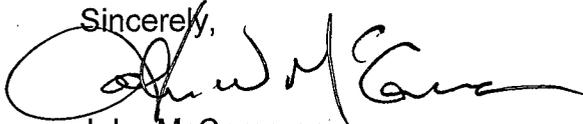
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impacts to aquatic resources. These measures should be considered for their applicability and inclusion as part of this overall review. DFG will be pleased to provide additional input, including problem statement and justification as this review continues.

If you have any questions, please contact Curt Babcock by email at cbabcock@dfg.ca.gov or by telephone at (530) 225-2740.

Sincerely,



John McCamman
Director

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