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December 17, 2020

Erik de Kok
Governor's Office of Planning and Research
1400 10th Street
Sacramento, CA 95814

Re: Draft Fire Hazard Planning Technical Advisory Public Comment

Dear Mr. de Kok,

Thank you for the opportunity to comment on the Draft Fire Hazard Planning Advisory. The California State Association of Counties (CSAC), representing California's 58 counties, provides these summary comments from our membership. CSAC supported the Fire Hazard Planning technical advisory was first published in 2015, and supports the current effort pursuant to the requirements of SB 901 (Dodd, 2018) and AB 2911 (Friedman, 2018), as codified in GC § 65040.21.

On the whole, CSAC found this to be a valuable tool for local fire departments by providing a concise set of resources to aid in developing and implementing wildfire prevention and mitigation programs. The recommendations are consistent with many efforts taking place across the county membership.

We concur that local governments have wide discretion in addressing locally important issues in their general plans. While the types of safety issues that concern each city or county may vary, most rural, suburban, and even urban communities recognize wildland fire hazard as a growing concern—one that is exacerbated by climate change, the expansion of development in the WUI, and increasing demands on natural resources.

As you note, OPR's 2017 General Plan Guidelines recommends that for every locally relevant issue, the local government should articulate one or more broad objectives, establish policies that would help achieve those objectives, and finally, devise implementation measures (specific action items or funding programs) to carry out the policies. CSAC supports the position that guidelines can serve as standards to insure uniformity of method and procedure, but should not mandate substantive or policy content. Land use and development problems and their solutions differ from one area to another and require careful analysis, evaluation, and appraisal at the local government level.

CSAC and its affiliate, the County Engineers Association of California, have focused efforts in the past year on post-wildfire actions. We recognize that the technical advisory focuses on fire hazards and we respectfully suggest that evaluation of the risks and hazards introduced post-fire, namely, flooding and debris flow, be incorporated into subject effort. The increasing challenge of post-wildfire flood and debris flows is a concern statewide, and particularly this year given the extensive nature of the season's wildfires.

In addition to our general comments above, we received specific comments individual counties that we would like to share.

Regarding Evacuation Routes: One county suggested a stronger statement in lieu of the requirements presented on page 21.

In 2019, two separate bills (AB 747 and SB 99) were signed into law that added new requirements for disclosing residential development without at least two points of ingress and egress and addressing the presence and adequacy of evacuation routes in the general plan safety element. New development in VHFHSZs without adequate access should be discouraged. At minimum, development without sufficient access must be disclosed to public. (page 21)

Regarding Clustering of Development. The update proposes clustering as a means of increasing wildfire defensibility. At the same time, some communities that want to prohibit clustering. There should be an effort to communicate the wildfire risk reduction effects of clustering. Counties should not be prohibited from clustering within VHFHSZs.

Regarding Infill Development. The advisory supports the need for infill in the document which is consistent with many county General Plans.

Regarding CEQA. As this update is rolled out, advice regarding how best to navigate CEQA when considering how to implement the policies included in this update would be appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Catherine Freeman", with a long horizontal flourish extending to the right.

Catherine Freeman
Legislative Representative
cfreeman@counties.org