

Attachment 2

Draft Comment Letter to the Board of Forestry

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

Subject: Proposed Amendments to State Fire Safe Regulations

Dear Chair Gillless:

Humboldt County has used certified alternative local fire safe regulation since 1993 and has been a participant in the ongoing process to amend State Fire Safe Regulations (FSRs). The Humboldt County Board of Supervisors recognizes that wildfire season is now nearly year-round, wildfires are becoming more destructive statewide and climate change will only worsen these conditions. Our Board supports the Board of Forestry's (BOF) efforts to improve the State FSRs to ensure the safety of the public and firefighters and to make clarifications to ensure that implementation is consistent and achievable and the need for exceptions is limited. However, we feel that one size fits all regulations, in particular applying road requirements to all infill building construction, within a State Responsibility Area (SRA) that varies greatly across the state will have substantial unintended consequences. Humboldt County requests that the BOF slow down its rule making process to ensure that the updated FSRs are scaled to address remote, rural areas and can be applied in a nuanced manner consistent with the variable wildfire vulnerabilities found within the SRA throughout California.

The SRA varies across the state in terms of climate, topography, vegetation, and existing development density within communities. The unincorporated area of Humboldt County contains nearly 2.3 million acres of land, approximately 1.6 million acres of which is SRA and a substantial majority of the remaining unincorporated area is national park, national forest, and Bureau of Land Management land. The County also contains extensive coastlines, expansive Redwood and mixed conifer forests, oak woodlands, open prairies, high mountains, and river valleys, significant portions of which are in SRA. All the unincorporated communities contain SRA and most of these communities are entirely in SRA. Approximately 85 percent of the parcels that are part of the County's certified Housing Element Residential Land Inventory are located within SRA, nearly 90 percent of which may be rendered unbuildable due to the proposed State FSRs road requirements.

The Humboldt County Board of Supervisors is very interested in participating in developing amendments to the State FSRs both to ensure that they are as protective of the public and firefighters as possible and to ensure that infill development in existing communities can occur in a responsible manner. Humboldt County asks that the BOF slow down its rule making process to ensure that the regulations contain more nuanced standards that achieve the same outcomes in terms of safety and that reflect the range of community types within SRA (such as the existing public investment in infrastructure such as sewer, water, fire protection, and roads).

Thank you for considering this comment. We are hopeful that your Board will slow down the rule making process to ensure that the updated FSRs and the interpretation of their implementation appropriately reflect the varied conditions and composition of communities within the SRA.

Sincerely

Virginia Bass, Chair
Humboldt County Board of Supervisors