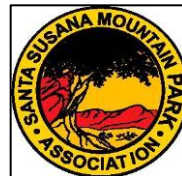
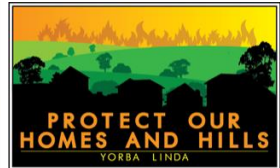
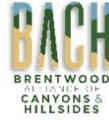




CENTRAL CALIFORNIA ENVIRONMENTAL JUSTICE NETWORK



SCIL Social Compassion in Legislation



Ventana Wilderness Alliance



RE: SB 55 Very high fire hazard severity zone: state responsibility area: development prohibition - SUPPORT

Dear Committee Chairs,

The undersigned organizations strongly support SB 55 (very high fire hazard severity zone: state responsibility area: development prohibition) by Senator Allen and Senator Stern, which seeks to prohibit the creation or approval of new development in very high fire hazard severity zones and state responsibility areas.

SB 55 is the clear first step in transitioning towards a safer coexistence with wildfires in California. Wildfires are a natural and necessary process in many of California's ecosystems. But historical fire regimes have been dramatically disrupted in recent history by European colonization, development, logging and fire suppression.

Development in high fire-prone wildlands is leading to more human-caused ignitions where people live (Radeloff et al. 2018). Nearly all contemporary wildfires in California are caused by human sources such as power lines, car sparks, cigarettes, and electrical equipment (Syphard et al. 2007; Balch et al. 2017). Building new developments in high fire-risk areas increases unintentional ignitions and places more people in danger. Since 2015 almost 200 people in the state have been killed in wildfires, more than 50,000 structures have burned down, hundreds of thousands have had to evacuate their homes and endure power outages, and millions have been exposed to unhealthy levels of smoke and air pollution.

Rampant sprawl development in fire-prone wildlands has also contributed to a dramatic increase in costs due to fire-suppression and damages. Costs in areas managed by Cal Fire were \$23 billion during the 2015-2018 fire seasons, which is more than double the wildfire cost for the previous 26 years combined after adjusting for inflation. Fifteen of the 20 most destructive California wildfires have occurred in the past five years.

Very high fire hazard severity zones and state responsibility areas have been identified by Cal Fire as areas that are likely to burn within 30 to 50 years. And hotter, drier and windier conditions due to climate change make the landscape more conducive to wildfire ignitions and spread. Yet local officials continue to greenlight massive new developments for mostly mid- to high-income homes in high fire-prone areas that have repeatedly burned in wildfires. Multiple wildfires have occurred on the project site for the 3,150-home Northlake development approved by L.A. County in 2019, and several wildfires have burned the site for the 3,000-home Otay Village developments approved by San Diego County in 2019 and 2020. Less than two months after Lake County approved a 16,000-acre luxury residential and resort project in Guenoc Valley, the 2020 LNU Complex Fire burned through the project area. If current sprawl-inducing land-use practices continue, instead of focusing on increasing affordable housing near city centers, between 640,000 to 1.2 million new homes will be built in the state's highest wildfire-risk areas by 2050 (Mann et al. 2014).

Impacts of wildfire disproportionately affect vulnerable communities with less adaptive capacity to respond to and recover from hazards like wildfire. Low-income and minority communities,

especially Native American, Black, Latinx and Southeast Asian communities, are the most marginalized groups when wildfires occur, in part, because they have fewer resources to have cars to evacuate, buy fire insurance, implement defensible space around their homes, or rebuild, and they have less access to disaster relief during recovery (Fothergill and Peak 2004; Morris 2018; Harnett 2018; Davies 2018; Richards 2019). Health impacts from wildfires, particularly increased air pollution from fine particulates (PM_{2.5}) in smoke, also disproportionately affect vulnerable populations, including low-income communities, people of color, children, the elderly and people with pre-existing medical conditions (Künzli et al. 2006; Delfino et al. 2009; Reid et al. 2016; Hutchinson et al. 2018; Jones et al. 2020).

In addition to the economic damage, public health impacts and human loss of life, altered wildfire regimes are degrading native habitats that many endangered and threatened plants and animals rely on. In California chaparral and sage scrub ecosystems, increasing fire frequency due to development is converting these shrublands into non-native grasses that burn more easily, leading to a dangerous “feedback loop” of increasing fire and degraded ecosystems (Keeley 2005; Syphard et al. 2018).

Unnaturally frequent wildfire in native shrublands can harm vulnerable native species already reeling from the impacts of habitat loss and fragmentation. Several Southern California mountain lions in the genetically compromised Santa Monica and Santa Ana populations have died in recent wildfires because they were unable to escape to safety due to surrounding roads and development. And post-fire landslides threaten already-imperiled amphibians and fish such as the mountain yellow-legged frog and unarmored threespine stickleback.

We strongly support SB 55 because it sets a standard for all local jurisdictions to invest in development that prioritizes human health and safety as well as the protection of California’s natural resources. Bold land use policies that consider the state’s diverse fire history and ecology, like SB 55, will help improve our relationship with wildfire and ensure a safer and healthier future for both humans and wildlife.

Thank you for your consideration of these comments.

Sincerely,

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