



RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

August 7, 2018

The Honorable Bill Dodd
Co-Chair, Wildfire Preparedness &
Response Legislative Conference
Committee
State Capitol, Room 5064
Sacramento, CA 95814

The Honorable Chris Holden
Co-Chair, Wildfire Preparedness &
Response Legislative Conference
Committee
State Capitol, Room 5132
Sacramento, CA 95814

**RE: Wildfire Preparedness & Response Legislative Conference Committee
Recommendations**

Dear Senator Dodd and Assembly Member Holden:

On behalf of the Rural County Representatives of California (RCRC), we would like to offer our recommendations to the Wildfire Preparedness & Response Legislative Conference Committee on much-needed, urgent actions the Committee should consider in order to prevent future catastrophic wildfire events. RCRC is an association of thirty-five rural California counties, and the RCRC Board of Directors is comprised of elected supervisors from those member counties.

RCRC member counties contain much of California's forested lands, including more than 70 percent of the State's national forest lands. As you know, wildfire risk is no longer just a concern in remote, rural areas, but is becoming a wider public safety concern as the wildland urban interface spreads over larger areas of the State due to climate change and the lingering impacts of the recent five-year drought. Despite the coordinated efforts between State and local governments to mitigate the impacts of wildfire, much work still needs to be done throughout the State to bring our forest lands to a healthy, resilient, wildfire-resistant condition.

While RCRC applauds the work of the Senate Bill 901 Conference Committee to heighten the safety of the electric grid in wildfire prone areas, we believe that the narrow scope of the Committee, which is currently focused on utility issues, circumvents the real root cause of the wildfire problems continually plaguing the State. We also believe that the very complex discussion of inverse condemnation is not only impeding the progress of achieving real wildfire prevention actions from this Committee, but is also laden with constitutional questions and ramifications for fire victims and rebuilding communities in the event of future wildfire catastrophes. RCRC has long advocated for an advancement

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in California's forest management practices as the true solution to California's wildland fire problem. While we appreciate the increases in funding from the Greenhouse Gas Reduction Fund (GGRF) to carry out the recommendations of the Forest Carbon Plan and other wildfire prevention and carbon sequestration activities, we believe the appropriate urgency has yet to be given to increasing the pace and scale of managing and restoring both State and federal forest lands within California's borders.

Currently, three major wildfires are burning across California, with several smaller fires in other areas of the State. The Carr Fire, which is already the sixth largest wildfire in California history, has killed seven, destroyed more than 1,000 homes and nearly 2,000 structures total, and burned more than 160,000 acres—with no cause whatsoever attributed to utilities. The Ferguson Fire is the largest wildfire ever on the Sierra National Forest, burning more than 90,000 acres, killing two and encroaching Yosemite National Park largely due to dead and dying trees that have yet to be removed and thinned in the area. Finally, the Mendocino Complex Fire, a combination of the Ranch Fire and the River Fire, is now the largest wildfire in modern State history, burning more than 290,000 acres and destroying 75 homes while the 240,000 acre Ranch Fire remains only 20 percent contained.

These fires mark another year of destruction that potentially could have been prevented or had less devastating impacts had the State given appropriate weight to forest management in previous years. This Committee now has a unique opportunity to impact future wildfires by implementing real solutions that will help prevent loss of lives, destruction of property, and profound emissions of greenhouse gases and other air pollutants. RCRC would like to offer the following recommendations as a starting point for your consideration:

Expand Partnerships with Federal Land Managers

Many of California's largest fires, such as the Ferguson Fire, begin and occur on federally managed lands. While we agree that federal land managers should bear responsibility for managing these lands, the reality is that the federal funding structure currently does not allow for enhanced pace and scale of forest management until the practice of fire borrowing ends in 2020. In the interim, California must take steps to utilize our resources to help the USDA Forest Service (USFS), in particular, increase their management activities on these lands in order to better protect California's residents. Possible improvements include:

- Allowing GHG funds to be utilized on all USFS lands, regardless of whether they are adjacent to State Responsibility Area lands.

- Increased use of Good Neighbor Authority by not only CAL FIRE, but by the various conservancies to duplicate projects such as the Sierra Nevada Conservancy's Watershed Improvement Program (WIP), using GHG funds.
- Streamlined CEQA compliance for projects on federal lands where NEPA has already been completed.

Permit and Regulatory Streamlining

While the State has done some regulatory streamlining, more can and should be done to promote healthier and more resilient forests, including:

- Establish a permit streamlining office to help with the processing of permitting for vegetation management projects and wood products utilization projects.
- Streamline the GHG emissions quantification process for projects using GGRF funds.
- Allow local governments to fund and conduct vegetation management projects on State lands for the purposes of reducing fire risk.
- Removing financial barriers to fuels treatment and fire prevention projects, such as allowing materials removed as part of a fuel break to be sold and processed to offset the cost of those projects.

Promote Wood Products Utilization

One of the largest barriers to properly managing the forests for resilience is the lack of infrastructure to utilize the materials removed from overly dense, unhealthy forests and other wildlands. RCRC recommends the following to help utilize these materials to their best benefit:

- Expand Senate Bill 859 eligible areas beyond tree mortality areas to promote enhanced forest resilience statewide.
- Modify SB 859 procurement term to allow facilities more flexibility.
- Establish a carbon offset protocol for biomass utilization projects.
- Provide financial assistance programs for expansion of existing wood processing facilities and construction of new wood processing facilities, as well as conversion of facilities to produce innovative wood products such as cross laminated timber.

RCRC would also recommend a robust continuous appropriation from the GGRF for forest health and resilience programs. The California Air Resources Board estimates that more than half of California's annual black carbon emissions result from wildfire, and RCRC would presume that percentage has grown over the past few years. Such a

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commitment would signify a prudent investment in the future of California's air, water, and public safety.

We appreciate your consideration of our recommendations. Please do not hesitate to contact me at sheaton@rcrcnet.org if you have any questions or would like to discuss further.

Sincerely,

A handwritten signature in black ink, appearing to read "Staci Heaton", with a large, sweeping flourish at the end.

STACI HEATON
Regulatory Affairs Advocate

cc: The Honorable Edmund G. Brown, Jr., Governor, State of California
Diana Dooley, Chief of Staff, Office of Governor Edmund G. Brown Jr.
Members of the Wildfire Preparedness & Response Legislative Conference
Committee