



RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

August 25, 2014

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

RE: SRA Fire Safe Regulations Update, 2014

Dear Chair Gilles:

The Rural County Representatives of California (RCRC) represents thirty-four rural counties across California. Our Board of Directors is comprised of one elected Supervisor from each member county, and our counties are tasked with a variety of road maintenance and land use planning activities. RCRC appreciates this opportunity to offer comments on the proposed SRA Fire Safe Regulations Update, 2014.

While RCRC acknowledges that these changes may make a community more fire safe, we question the assessment that no costs will be incurred by homeowners or local agencies by these changes. Despite the fact that these regulations seem only to be attempting to change rules affiliated with new development, and thereby any increase in costs over and above what compliance would be under current rules could be rolled into new development costs, RCRC believes that there could be higher costs imposed on local governments and on individuals in attempting to comply with these regulations.

Changes to road width, roadway surfacing materials, requirements regarding road signs, size and shape of roadway turnarounds, turnouts, and bridges all could potentially increase costs to local governments. Even if these regulations were to be applied only to new developments, counties would likely be tasked with the maintenance and repair of these roads—larger roadways, specialty surfacing, increased strength, and bracing in bridges all are likely to increase the costs of maintaining these roads. Moreover, substantive changes to these regulations could increase county liability for any existing roads or structures that do NOT meet these standards, even if the jurisdiction is not formally REQUIRED to meet them.

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Additionally, sizes of letters, numbers and symbols for addresses, the need to maintain water for wildfire fighting, and specific rules regarding driveways will increase the cost of development, potentially driving away this vitally needed economic development in many rural and economically depressed areas.

RCRC supports defensible space activities, fuels management, and other methods to make our rural communities more fire safe. However, that need must be balanced against the reality of minimal county general fund budgets and the fact that changes to rules governing those municipal structures and roads will, ultimately, increase costs to those local governments responsible for them.

We thank you again for this chance to comment on the proposed Update, and look forward to working with the Board in the future. Please do not hesitate to contact me if you have any questions or would like to discuss our comments.

Sincerely,

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

STACI HEATON
Regulatory Affairs Advocate

cc: Members of the California Board of Forestry and Fire Protection
George Gentry, California Board of Forestry and Fire Protection
RCRC Board of Directors