



May 21, 2019

Senator Hannah-Beth Jackson
State Capitol, Room 2032
Sacramento, California 95814

SUBJECT: **SUPPORT FOR SB 182 (JACKSON) – WILDFIRE PLANNING
AND MITIGATION IN VERY HIGH FIRE HAZARD SEVERITY
ZONES (VHFHSZ) - ON THE SENATE FLOOR**

Dear Senator Jackson:

The American Planning Association, California Chapter (APA California) is pleased to support your bill, SB 182. Your bill makes a number of important changes regarding planning for and permitting development in the very high fire hazard severity zones (VHFHSZ) and in other areas designated in the Wildland-Urban Interface (WUI). The bill also proposes new enforcement and funding requirements.

In just two years, California has faced the deadliest and most destructive fires in California's history. Sadly, these and many other wildfires in the recent past have become the state's "new normal," and in turn, cities and counties can and must do more to prepare. This means recasting how land use planning is done in fire-prone areas and ensuring local jurisdictions are supported with effective enforcement mechanisms and adequate funding to make critical changes.

PLANNING

APA California supports state action that requires local governments to use good land use planning to reduce wildfire risk for new development by reducing density in outlying fire-prone areas and strongly discouraging upzonings and new subdivisions in fire hazard areas. Cities and counties with WUI areas should focus housing development in the least hazardous areas within their jurisdiction, which may mean increasing density in those less-hazardous areas. They also need to include robust fire hazard mitigation measures for all new developments within the WUI. SB 182 will require local jurisdictions to make changes to the land use and safety elements of the General Plan to help implement these sound planning principles.

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SB 182's planning changes include important wildfire risk reduction standards to be applied to new developments, including decisions about whether or not new development should even be approved in the VHFHSZ. The bill also requires local governments to create a comprehensive retrofit strategy and identify WUI areas within the jurisdiction and provides a robust list of data and analysis based on the Office of Planning and Research's (OPR) "Fire Hazard Planning – General Plan Technical Advice Series." SB 182 will also require jurisdictions to develop overlay zones in their zoning ordinance to ensure consistency with the General Plan.

APA California believes that SB 182 supports California's housing priorities by encouraging more sustainable housing development practices. SB 182 ensures proper planning so that new developments are appropriately designed and/or directed to less-hazardous areas within a jurisdiction. Communities need to meet their affordable housing needs, as state law requires and as our communities so desperately need, but they need to do it in a sustainable way that builds in long-term protection for those very same homes, including life-safety protections for the future residents of those homes.

WUI DESIGNATION

SB 182 focuses on the VHFHSZ as designated by CalFire mapping. However, SB 182 will also allow jurisdictions to adopt additional areas designated as WUI. We understand that forthcoming amendments will clarify the process for which this designation can be made. However, it is important to recognize that, in practical terms, the WUI extends well beyond the VHFHSZ designated by CalFire. For example, the WUI building standards apply in both high and moderate fire hazard severity zones, in addition to the VHFHSZ. While APA California believes that more needs to be done in areas that are within the WUI but not designated as a VHFHSZ, we believe the requirements in SB 182 are an important first step. APA California hopes that future consideration will be given to those broader areas that also pose considerable risks in the WUI. In recent years, wind-driven firestorms have changed the dynamics of wildfire planning in California and those firestorms know no boundaries.

ENFORCEMENT

Sound planning and effective development standards are an important element in safeguarding communities, but they are only a piece of the much bigger puzzle. Effective local enforcement programs are also critical. SB 182 will allow a fee to be charged on new developments to cover the costs of an enforcement program in order to ensure local property compliance with defensible space and vegetation management requirements. The bill also requires accountability on inspections of those properties. APA California strongly supports these provisions in the bill.

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FUNDING

Another critical piece of the puzzle is adequate funding. SB 182 proposes a number of planning changes that will require extensive work, much of it in smaller jurisdictions with limited staff resources. The bill proposes assistance in funding projects that will not only control the spread of wildfires but will also protect the safety of residents in the event of an emergency. Retrofitting is also another costly but important issue that must be addressed. Existing development in the WUI is very vulnerable, and important retrofitting just won't happen without funding. However costly, funding will be a long-term investment in the preservation and safety of California's communities. APA California hopes that these critical issues remain a priority for legislative attention and continue to receive state support in the form of funding to help reduce the destruction that future wildfires may cause.

APA California commends your steadfast commitment to this issue. This is both an important issue and tough conversation. We appreciate your continued efforts on this issue and remain committed to working with you on this important piece of legislation. Unfortunately, there is no doubt that California will continue to face more intense wildfires (and other natural disasters) in the future. Planning must be done now to protect homes and lives. All of the elements of SB 182 are critical components of the discussion that, together, we hope will better prepare our communities for the wildfires that we know will be part of California's future. For those reasons, APA California stands in strong support of SB 182.

If you have any questions, please contact Lauren De Valencia, Stefan/George Associates, APA California's lobbyist, at 443-5301, lauren@stefangeorge.com.

Sincerely,



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APA California

cc: The Senate, Governor, OPR, Republican Caucus

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