April 13, 2020

California Board of Forestry and Fire Protection
Attention: Eric Hedge, Regulations Program Manager
P.O. Box 944246
Sacramento, CA 95814

RE: Finding of Emergency and Notice of Proposed Emergency Action,
"Emergency Fuel Hazard Reduction Amendments, 2019".

Mr. Hedge and members of the Board of Forestry:

The Department of Conservation's California Geological Survey (CGS) appreciates the opportunity to provide comment on the Emergency Fuel Hazard Reduction Amendment rule making.

As you may be aware, over the years CGS has worked with CALFIRE in response to evaluation of Post-Fire debris flows following significant wildfires. CGS has played a lead role in development of these types of evaluations, including documenting post-fire landslide events.

We would like to bring to your attention that the emergency rule language uses the term "mudslides" several times. We would respectively ask that the word "mudslides" be changed to "post-fire debris flows, sediment laden floods, and landslides". This would be a more technically correct term and would be more correctly tied to literature regarding this subject.

We also respectively ask that the following be included in the list of evidence of the immediate and necessary need for emergency regulations:

> The Department of Conservation, California Geological Survey, is working on development of pre-fire mapping that will be conducted to identify high hazard urbanized areas statewide that are subject to the fire-flood sequence and can be utilized to inform mitigation activities and reduce losses to life and property through flash flood/debris flow risk awareness and evacuation planning.

Ultimately it is our thought that the overlap of areas of high fuel concentrations and areas prone to post-fire debris flows that can impact the urban interface would be considered the highest priority areas to conduct fuel reduction activities.

Should you have any questions, please feel free to contact me.
Regards, David Longstreth, Acting Supervising Engineering Geologist.