

FINAL STATEMENT OF REASONS (FSOR)
CALIFORNIA CODE OF REGULATIONS
Title 14. NATURAL RESOURCES
DIVISION 1.5 DEPARTMENT OF FORESTRY AND FIRE PROTECTION* (Refs & Annos)
CHAPTER 7. FIRE PROTECTION* (Refs & Annos)
SUBCHAPTER 3. FIRE HAZARD
ARTICLE 1. FIRE HAZARD SEVERITY
Section 1280.01

UPDATE TO THE INITIAL STATEMENT OF REASONS

The Office of the State Fire Marshal (OSFM) has provided an update to the Initial Statement of Reasons. There have been no changes in the applicable laws or to the effects of the proposed regulations from those described in the Initial Statement of Reasons (ISOR) published with the Notice of Proposed Regulatory Action. The OSFM proposes to adopt regulations to designate Fire Hazard Severity Zones (FHSZ) in the State Responsibility Area (SRA).

Changes Made During the 45-Day Public Comment Period

The SFM made available a 45-day public comment period for the proposed regulations from December 16, 2022, through February 3, 2023, for the map entitled “State Responsibility Area Fire Hazard Severity Zones” dated November 21, 2022

Changes Made During the 60-Day Extension to Public Comment Period

The OSFM then provided an additional written comment period to allow more time for review of the map entitled “State Responsibility Area Fire Hazard Severity Zones.” The additional written comment period for this action was February 3, 2023, through April 4, 2023. The OSFM received 1,181 written comments on the proposed regulation as originally noticed. The final statement of reasons includes staff revisions following the close of the 110-Day public comment period.

Changes Made During the First 15-Day Public Comment Period

After the close of the 111-day public comment period, the OSFM made available changes made to the map entitled “State Responsibility Area Fire Hazard Severity Zones” dated June 15, 2023. The written comment period also allowed for review of the intermediate data used to create the map. The additional written comment period for this action was June 26, 2023, through August 9, 2023.

The OSFM received 167 written comments on the proposed regulation as originally noticed. The final statement of reasons includes staff revisions following the close of the 45-Day public comment period.

Changes Made During the Second 15-Day Public Comment Period

The OSFM then provided an additional written comment period to allow for review of changes made to the map entitled “State Responsibility Area Fire Hazard Severity Zones” dated September 29, 2023, in the document entitled “Specific Change Maps September 29 2023.pdf.” The specific changes for which public comment were accepted are:

- Change Map 025 | FHSZSRA_23_3, San Luis Obispo Coast, San Luis Obispo County
- Change Map 026 | FHSZSRA_23_3, Avila Beach area, San Luis Obispo County
- Change Map 027 | FHSZSRA_23_3, Lebec area, Kern County
- Change Map 028 | FHSZSRA_23_3, Quail Lake area, Los Angeles County
- Change Map 029 | FHSZSRA_23_3, Santa Clarita area, Los Angeles County
- Change Map 030 | FHSZSRA_23_3, Muscoy area, San Bernardino County
- Change Map 031 | FHSZSRA_23_3, Rancho Mission Viejo area, Orange County

The additional written comment availability was October 13, 2023, through October 30, 2023.

Following the close of the 18-day public comment period, the OSFM received 21 written comments on the proposed regulation as originally noticed. The OSFM did not make any amendments to the text of regulation in response to the comments received. There were no further modifications made and no further comment periods.

The OSFM also made non substantive changes to the final regulation text, including: renumbering proposed 19 CCR section 1280.00 and 1280.01 to 19 CCR sections 2200 and 2201, as the initially proposed sections are currently occupied by another Chapter; outright repealing 14 CCR section 1280.01 rather than striking the substantive language and noting that the “[r]egulations previously found in this section are now adopted as [19 CCR 2201]”; and minor grammatical corrections.

The OSFM has considered all relevant matters presented to it and recommends approval of the proposed regulatory action.

Documents Incorporated by Reference

The map incorporated by reference in this action is a formal publication reasonably available from the OSFM at any time upon request and during the rulemaking action. The map will not be printed in the California Code of Regulations because to do so would be cumbersome, unduly expensive, or otherwise impractical. The map, including the Geographic Information System (GIS) data, are available on the OSFM website located at <https://osfm.fire.ca.gov/fire-hazardseverity-zones>. The link is also provided in the express terms of the proposed amendments to the regulation.

The map, approved by the OSFM, are documents incorporated by reference and entitled “State Responsibility Area Fire Hazard Severity Zones” dated September 29, 2023.

TECHNICAL, THEORETICAL AND/OR EMPIRICAL STUDIES OR REPORTS

The OSFM did not rely on any report or other document in the development of this rulemaking beyond that previously identified in the Initial Statement of Reasons and the notice addendums to the Initial Statement of Reasons.

ALTERNATIVES THAT WOULD LESSEN ADVERSE ECONOMIC IMPACT ON SMALL BUSINESS

No alternatives were proposed to the OSFM that would lessen any adverse economic impact on small business.

ALTERNATIVES TO THE REGULATION

The OSFM invited interested persons to present statements or arguments with respect to alternatives to the proposed regulations during the public comment period. However, the OSFM received no proposed alternatives that would lessen any adverse economic impact on small business.

ALTERNATIVES DETERMINATION

In accordance with Government Code section 11346.9(a)(4), the Office of the State Fire Marshal (OSFM) has considered alternatives and has determined that no available alternative would be more effective in carrying out the purposes for which the action is proposed; or would be as effective and less burdensome to affected private persons than the proposed action; or would be more cost effective to affected private persons and equally effective in implementing the statutory policy or other provision of law. The OSFM could have not proposed this action, but Public Resources Code section 4204 requires the periodic review of the Fire Hazard Severity Zones (FHSZ) and updates when necessary. Given the length of time since the FHSZ's were last updated and the change in factors to be considered, the OSFM believes this update was necessary.

MANDATE ON LOCAL AGENCIES OR SCHOOL DISTRICTS

The proposed amendments to the regulations do not impose any mandate on local agencies or school districts.

COORDINATION WITH FEDERAL LAW

The OSFM has determined that this proposed regulatory action neither conflicts with nor duplicates any applicable federal regulation contained in the Code of Federal Regulations. There have been no changes in applicable laws related to the proposed action or to the effect of the proposed regulation from the laws and effects described in the Notice of Proposed Action.

SUMMARY AND RESPONSE TO COMMENTS RECEIVED DURING THE 45-DAY PUBLIC COMMENT PERIOD

A summary of the comments and responses are included in "Attachment A" of the FSOR.

Attachment A

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Comment(s): Additional Time Response

Overview: Additional Time Comments

Overview: Additional Time Comment – The Office of the State Fire Marshal Received 38 comments requesting additional time to the comment period as the public felt the initial 45-days from December 16, 2022, to February 3, 2023, was not adequate to comment on the Fire Hazard Severity Zone Map. The comment ID's that relate to those comments are as followed below: [430, 589, 669, 687, 718, 721, 722, 730, 733, 734, 735, 736, 739, 740, 741, 742, 745, 746, 824, 1012, 1076, 1133, 1140, 1169, 1965, 2014, 2151, 2166, 2204, 2223, 2270, 2294, 2301, 2303, 2305, 2312, 2327, 2646].

Response: The Administrative Procedure Act (APA) requires a minimum 45-day public comment period. The initial public comment period opened on December 16, 2022, with an initial close date of February 3, 2023, at 11:59PM. However, based on the feedback from the public hearings that were held in 56 counties, and a Statewide meeting held in Sacramento, the State Fire Marshal opted to extend the deadline an additional 60-days to April 4, 2023, at 11:59PM. On June 26, 2023, the State Fire Marshal elected to have another 45-day comment period from June 26, 2023, to August 9, 2023. On October 13, 2023, the State Fire Marshal elected to have a 15-day comment period from October 13, 2023, to October 30, 2023.

Comment(s): Homeowners Association Response

Overview: Homeowners Association Comments

Overview: HOA Comment – The Office of the State Fire Marshal received 25 comments that related to Homeowners Association (HOA) concerns and the stringent guidelines HOAs place upon residents is enough of a guideline, therefore should require a zone classification change. The comment ID's that relate to those comments are as followed below: [78, 196, 416, 418, 541, 815, 1017, 1029, 1102, 1104, 1108, 1188, 1394, 1395, 1606, 1979, 1986, 2025, 2043, 2051, 2649, 2650, 2656, 2657, 2751].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The Office of the State Fire Marshal is required by Public Resources Code 4202 to provide for the classification of lands within state responsibility areas in accordance with the severity of fire hazard present for the purpose of identifying measures to be taken to retard the rate of spreading and to reduce the potential intensity of uncontrolled fires that threaten to destroy resources, life, or property. Hazard is based on the physical conditions that create a likelihood and expected fire behavior over a 30 to 50-year period without considering mitigation measures such as home hardening, recent wildfire, or fuel reduction efforts. Risk is the potential damage a fire can due to the area under existing conditions, accounting for any modifications such as fuel reduction projects, defensible space, and ignition resistant building construction.

Comment(s): Los Angeles County Response

Overview: Los Angeles Comments

Overview: Los Angeles County Comment – The Office of the State Fire Marshal received 12 comments that are related to Los Angeles County Brush Clearance Tax. The comment ID's that relate to those comments are as followed below: [1554, 1604, 1678, 1886, 1906, 2156, 2183, 2206, 2234, 2270, 2371, 2651].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The proposed regulation only designates Fire Hazard Severity Zones (FHSZ) in the State Responsibility Area (SRA). Local ordinances and taxes are a function of the local jurisdiction, and the Office of the State Fire Marshal does not regulate local ordinances. Public Resources Code 4291 requires defensible space in Moderate, High, and Very High FHSZ in the SRA and Government Code 51182 requires defensible space in Very High FHSZ in the Local Responsibility Area (LRA). The FHSZ zones requiring defensible space in Los Angeles County are based off the 2007 adopted maps in the SRA and the regulation adopted by Los Angeles County (LRA). The current FHSZ regulatory process does not have any effect on this comment as defensible space is required in all FHSZ zones in the SRA.

Comment(s): Local Responsibility Area Response

Overview: Local Responsibility Area Comments

Overview: Local Responsibility Area – The Office of the State Fire Marshal received 17 comments related to Local Responsibility Area. The comment ID's that relate to those comments are as followed below: [566, 608, 611, 758, 771, 789, 904, 976, 977, 1115, 1942, 2267, 2351, 2354, 2457, 2651, 3099].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The proposed regulation only designates Fire Hazard Severity Zones in the State Responsibility Area. Once the regulation is effective, the identification process for the Local Responsibility Area will occur.

Comment(s): Increase Fire Zone Response

Overview: Increase Fire Zone Comments

The Office of the State Fire Marshal received 1 comment that requested that the Fire Marshal Increase the fire zone to a higher zone, as the constituent did not think that a high zone was high enough, but the area warranted a very high zone. The comment ID that relates to this comment is as followed: [766]

Response: OSFM thanks the constituent for the review of an area, CAL FIRE has determined the area is appropriately classified.

Comment(s): Outreach Response

Overview: Outreach Comments

Overview: Outreach Comment – The Office of the State Fire Marshal received 61 comments that constituents were concerned with how the State Fire Marshal handled public outreach regarding the Fire Hazard Severity Zone draft maps. The comment ID's that relate to those comments are as followed below: [54, 205, 207, 446, 476, 543, 547, 589, 593, 598, 606, 610, 611, 613, 669, 679, 680, 701, 763, 919, 1009, 1012, 1076, 1097, 1122, 1138, 1169, 1176, 1669, 1722, 1783, 1858, 1883, 1886, 1897, 1942, 1950, 1965, 2145, 2156, 2163, 2166, 2204, 2248, 2256, 2258, 2282, 2286, 2294, 2297, 2301, 2303, 2304, 2312, 2327, 2368, 2371, 2374, 2630, 2646, 2685].

Response: The State Fire Marshal notified each County Board of Supervisors and held a public hearing in each county with a Fire Hazard Severity Zone designation in the State Responsibility Area as required by Public Resources Code 4203. For all public comment periods and extensions, all requirements of the Administrative Procedure Act (APA) were followed.

Comment(s): Thank You Response

Overview: Thank You Comments

Overview: Thank You Comment – The Office of the State Fire Marshal received 71 comments from San Luis Obispo County that thanked the State Fire Marshal for adjusting zone classifications within the county. The comment ID's that relate to those comments are as followed below: [3115, 3139, 3142, 3147, 3153, 3155, 3157, 3163, 3186, 3201, 3202, 3348, 3350, 3353, 3354, 3355, 3356, 3357, 3358, 3359, 3360, 3361, 3363, 3364, 3365, 3368, 3369, 3370, 3371, 3372, 3374, 3376, 3377, 3378, 3379, 3380, 3381, 3382, 3383, 3384, 3385, 3386, 3387, 3388, 3389, 3390, 3391, 3392, 3393, 3394, 3395, 3497, 3568, 3570, 3571, 3572, 3573, 3574, 3575, 3576, 3577, 3578, 3579, 3580, 3581, 3582, 3583, 3584, 3588, 3590, 3591].

Response: The Office of the State Fire Marshal appreciates the responses and additional public review received in this area of the map dated June 15, 2023, which was adjusted from comments received from the public comment period that ended April 4, 2023.

Comment(s): Withdraw Response

Overview: Withdraw Comments

Overview: Withdraw Comment – The Office of the State Fire Marshal received 2 comments from a constituent who submitted a formal comment, then located the information they were

looking for on the OSFM website and withdrew the comment. The comment ID's that relate to those comments are as followed: [366, 548].

Response: No response is provided for these comments. This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking.

Comment(s): Housing and Building Concern Response

Overview: Housing and Building Concern Comments

Overview: Housing and Building Concern Comment – The Office of the State Fire Marshal received 33 comments asking why future development is considered as wildland. The comment ID's that relate to those comments are as followed below: [719, 742, 866, 1231, 1880, 2025, 2055, 2086, 2104, 2142, 2147, 2164, 2220, 2225, 2284, 2317, 2325, 2328, 2329, 2331, 2340, 2349, 2351, 2457, 2648, 2656, 2663, 2665, 3265, 3266, 3267, 3280, 3286].

Response: Project timelines may be uncertain and variable, therefore wildland areas targeted for development are not considered part of the non-wildland until construction has begun. In cases where development replaces agriculture use, the area is already zoned as non-wildland.

Overview: Housing and Building Concern Comment – The Office of the State Fire Marshal received 11 comments concerned that the new maps would discourage building in various SRA lands. The comment ID's that relate to those comments are as followed below: [562, 567, 589, 603, 923, 978, 1725, 1798, 1855, 1942, 1950].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The minimum required mitigation for building and development in the State Responsibility area are the same across all Fire Hazard Severity Zones (FHSZ). Therefore, FHSZ changes do not affect building requirements in the State Responsibility Area.

Overview: Housing and Building Concern Comment – The Office of the State Fire Marshal received 3 comments asking how the building industry was responding to the new maps. The comment ID's that relate to those comments are as followed: [610, 1740, 2209].

Response: The Office of the State Fire Marshal has been working closely with the building industry when setting various building codes and defensible space requirements related to Fire Hazard Severity Zones. The Office of the State Fire Marshal has received comments from the building industry and has provided responses to them in the Final Statement of Reasons.

Overview: Housing and Building Concern Comment – The Office of the State Fire Marshal received 13 comments asking how this will affect a community's ability to build. The comment ID's that relate to those comments are as followed below: [292, 327, 690, 734, 741, 817, 998, 1011, 1021, 1117, 1122, 1732, 2361].

Response: The minimum required mitigation requirements for building and development in the State Responsibility area are the same across all Fire Hazard Severity Zones (FHSZ). Therefore, FHSZ changes do not effect building in the State Responsibility Area.

Overview: Housing and Building Concern Comment – The Office of the State Fire Marshal received 90 comments concerned with building cost and would encourage people to leave

California with new zone classifications. The comment ID's that relate to those comments are as followed below: [1768, 1769, 1776, 1777, 1782, 1785, 1786, 1796, 1809, 1816, 1825, 1863, 1866, 1881, 1887, 1898, 1899, 1900, 1901, 1904, 1968, 1988, 1989, 1991, 1993, 1994, 1995, 1996, 1998, 1999, 2002, 2003, 2004, 2006, 2009, 2010, 2011, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2023, 2024, 2026, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2041, 2042, 2080, 2108, 2201, 2248, 2282, 2301, 2302, 2303, 2308, 2312, 2313, 2326, 2327, 2336, 2360, 2647, 2666, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2680, 3589].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The minimum required mitigations for building and development in the State Responsibility area are the same across all Fire Hazard Severity Zones (FHSZ). Therefore, FHSZ changes do not affect building requirements in the State Responsibility Area.

Overview: Housing and Building Concern Comment – The Office of the State Fire Marshal received 3 comments asking why the updated WUI codes did not absolve a community's zone classification. The comment ID's that relate to those comments are as followed below: [1967, 2649, 2650].

Response: Fire Hazard Severity Zone maps inform where mitigations are required during planning and building construction. WUI codes are mitigations to reduce the risk of damage to structures.

Overview: Housing and Building Concern Comment – The Office of the State Fire Marshal received 112 comments concerned that with the new zones, homeowners will be unable to sell their property based on the individual zone classification. The comment ID's that relate to those comments are as followed below: [821, 987, 989, 994, 997, 1003, 1014, 1020, 1028, 1030, 1034, 1041, 1050, 1055, , 056, 1058, 1061, 1062, 1067, 1074, 1078, 1079, 1087, 1092, 1093, 1094, 1105, 1118, 1134, 1135, 1139, 1144, 1145, 1148, 1154, 1156, 1160, 1161, 1165, 1175, 1178, 1195, 1201, 1208, 1503, 1507, 1511, 1513, 1515, 1520, 1521, 1523, 1527, 1528, 1530, 1534, 1545, 1571, 1575, 1584, 1588, 1593, 1594, 1596, 1604, 1735, 1736, 1739, 1790, 1819, 1888, 1902, 1908, 1970, 1978, 1985, 1987, 2051, 2111, 2153, 2157, 2162, 2165, 2179, 2208, 2219, 2226, 2238, 2252, 2259, 2269, 2296, 2323, 2355, 2512, 2530, 2629, 2678, 2679, 2712, 2714, 2715, 2717, 2718, 2719, 2720, 2721, 2722, 2723, 2724, 3146, 3352].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Separate statutory mandates outside of the OSFM's regulatory scope require that all property in High or Very High FHSZs in the SRA comply with Civil Code 1102.6f, real estate disclosures Assembly Bill 38 (Wood, Chapter 391, Statutes of 2019). These disclosures are known as "AB 38 Defensible Space Inspections," and are not required for property in Moderate FHSZs in the SRA. As a result of the proposed regulations, the boundaries of Moderate, High, or Very High FHSZs in the SRA may shift, altering which properties are required to comply. However, every FHSZ in the SRA is already required to comply with the underlying defensible space requirements of AB 38 located in PRC Section 4291.

Overview: Housing and Building Concern Comment – The Office of the State Fire Marshal received 4 comments concerned with a community's ability to build, ultimately adding to the rising building cost. The comment ID's that relate to those comments are as followed below: [721, 2204, 2289, 2295].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The minimum required mitigation requirements for building and development in the State Responsibility area are the same across all Fire Hazard Severity Zones (FHSZ). Therefore, FHSZ changes do not effect building in the State Responsibility Area.

ID 2235, Comment: County of Tulare April 3, 2023 California Department of Forestry and Fire Protection Office of the State Fire Marshal C/O: Scott Witt California Natural Resources Building 715 P Street, 9th floor Sacramento, CA 95818 RE: State Responsibility Area - Fire Hazard Severity Zones On behalf of the Tulare County Board of Supervisors, I write to respectfully oppose the expansion of fire hazard severity zones in Tulare County, particularly in the absence of consultation with the County. The State of California has recently implemented numerous changes to law and regulations that effect the State Responsibility area (SRA) and will now be including Local Responsibility Areas (LRA). Title 14 - California Code of Regulations, Division 1.5, Chapter 7. Subchapter 2, Articles 1-5, State Minimum Fire Safe Regulations were revised and implemented in January 2023. There are many significant challenges for building owners if they choose to remodel or build in the SRA area of Tulare County, one being significant access and egress improvements. State of California has now created LRA - Very High Hazard Severity Zones and have or will identify these zones within Tulare County with little to no Tulare County interaction. These zones once identified by the State of California, will require Tulare County constituents to meet or exceed newly revised Title 14 - California Code of Regulations, Division 1.5, Chapter 7. Subchapter 2, Articles 1-5, State Minimum Fire Safe Regulations. These requirements will now require new construction in these identified areas, to increase fire protection features, ingress and egress fire apparatus access roads and multiple other challenging regulations. In addition to the above identified changes this also creates additional hazard reduction inspections and enforcement requirements that are currently unfunded and unstaffed. Title 24, California Code of regulations, building regulations has Chapter 7 A - Materials and Construction Methods for Exterior Wildfire Exposure will now be applicable to all LRA - Very High Hazard Severity Zones the State of California identifies within Tulare County. These regulations will increase construction costs and may hamper development and expansion within the county. More recently, California Department of Forestry and Fire Protection (Cal Fire) and the Office of the State Fire Marshal (SFM) are updating the Fire Hazard Severity Zones (FHSZ) map statewide. Cal Fire advise Tulare County that numerous areas would be increased to the most severe category of "Very High". While this doesn't change current Building Code or Fire Code requirements, it will definitively impact property insurance in these areas. Tulare County has received numerous calls from its constituents that their insurance companies are dropping them do to the Fire Hazard Severity Zones within Tulare County. Pg 2. RE: State Responsibility Area - Fire Hazard Severity Zones This leaves our constituents with the only option of the California Fair Plan for wildfire insurance protection, which is significantly more expensive. Finally, the change in the area now consumed by the 2022 (VHFHSZ) versus the 2007 maps show great increases near the developable areas of our largest foothill communities in Tulare County, specifically, Three Rivers, and Springville. The effect along the western edge of the Sierra Foothills and mountains includes the impact to potential developments in our "foothill development" corridors, and in our mountain communities. This would create inconsistency with the 2012 Safety Element in the County's 2030 General Plan and would cause further inconsistency with our existing standards under the Planned Development Foothill Mobile Home Overlay (PDFM) Zone, which is where most developments would occur in the County. Both of

which will require an update to our General Plan, and potentially our Zoning Ordinance, for the foothill and mountain communities. Despite having higher fire requirements than most jurisdictions already. As noted, development was already more difficult under the new fire standards which require secondary accesses, extended road improvements for new homes, but also entirely new building permit requirements. Moreover, the additional VHFHSZ will also increase development standards that will make rebuilding, or any potential new developments in Tulare County nearly impossible. Therefore, this map will take away a landowner's right to build or rebuild their property after a fire. For these reasons, we respectfully oppose the expansion of fire hazard severity zones in Tulare County, and welcome meaningful collaboration in defining zones that do not have adverse impacts on our communities. If you have any questions regarding our position, please feel free to contact us at (559) 636-5000.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Project timelines may be uncertain and variable, therefore wildland areas targeted for development are not considered part of the non-wildland until construction has begun. In cases where development replaces agriculture use, the area is already zoned as non-wildland. The minimum required mitigation requirements for building and development in the State Responsibility area are the same across all Fire Hazard Severity Zones (FHSZ). Therefore, FHSZ changes do not effect building in the State Responsibility Area. Mitigations are important for reducing wildfire risk in hazardous areas as identified by FHSZ. Higher hazard implies that compared to other areas of the state, a fire is either more likely to occur, could occur with more intense fire behavior, or both. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk, not a measure of whether or not mitigations have been done. FHSZ is intended for long term planning purposes; it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. Thus, FHSZ zoning justifies the mitigation actions. CAL FIRE's maps are intended to drive local planning decisions, not insurance decisions. Under Commissioner Lara's new regulation finalized in October 2022, insurance companies must provide discounts for wildfire safety actions such as community mitigation and home-hardening, which CAL FIRE's maps do not assess. In addition, insurance companies are already using risk analysis tools and models that go beyond CAL FIRE's proposed maps in determining what properties they will underwrite. Commissioner Lara's new wildfire safety regulation will help increase access to insurance by promoting wildfire safety across the state. Reducing wildfire risks throughout the state is the primary way we can make insurance more available and affordable, and our regulation is a major step towards that goal. CAL FIRE's maps support that goal through improving public education about hazard and the need for safety preparation.

Comment(s): Mitigation and Fuel Reduction Response

Overview: Mitigation and Fuel Reduction Comments

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 131 comments asking why fuels reduction projects and defensible space are not accounted for to reduce hazard in when mapping Fire Hazard Severity Zones. The comment ID's that relate to those comments are as followed below: [27, 78, 79, 80, 111, 196, 210, 231, 281, 282, 284,

343, 432, 441, 442, 446, 522, 542, 546, 552, 562, 565, 570, 571, 693, 740, 753, 755, 756, 762, 790, 810, 815, 822, 848, 1015, 1021, 1023, 1029, 1088, 1172, 1179, 1231, 1431, 1472, 1517, 1531, 1532, 1577, 1586, , 598, 1604, 1606, 1639, 1709, 1718, 1720, 1722, 1819, 1855, 1859, 1861, 1866, 1868, 1884, 1885, 1886, 1888, 1889, 1890, 1897, 1903, 1962, 1970, 1972, 1986, 2008, 2022, 2045, 2091, 2109, 2110, 2127, 2139, 2156, 2161, 2164, 2183, 2184, 2190, 2204, 2225, 2244, 2254, 2255, 2261, 2270, 2273, 2278, 2297, 2304, 2337, 2351, 2370, 2372, 2435, 2457, 2512, 2629, 2647, 2655, 2686, 2690, 2693, 2695, 2751, 3009, 3070, 3094, 3136, 3265, 3266, 3267, 3272, 3280, 3284, 3286, 3339, 3347, 3454, 3545].

Response: Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk. Higher hazard implies that compared to other areas of the state, a fire is either more likely to occur, would occur with more intense fire behavior, or both. Because FHSZ is intended for long term planning purposes it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term.

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 15 comments asking why individual property still has a hazard after I have completed home hardening. The comment ID’s that relate to those comments are as followed below: [240, 610, 692, 866, 1036, 1153, 1181, 1676, 1680, 1684, 1685, 1700, 2195, 2208, 2530].

Response: Home hardening is considered a risk reduction method to reduce the impacts of the hazard. Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are to impacts. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk (such as the California Wildfire Mitigation Program).

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 20 comments asking if part of a Firewise community, why does that not count in the maps. The comment ID’s that relate to those comments are as followed below: [298, 447, 795, 96, 813, 1016, 1017, 1018, 1022, 1047, 1182, 1205, 1728, 1807, 1905, 1971, 1997, 2140, 2293, 3468].

Response: Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are to damage. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk. Firewise community activities are targeted at reducing the risk to communities from the associated hazard and are consequently almost always in communities that have FHSZ zones in them.

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 23 comments asked, if I mitigated my property, will the State Fire Marshall come look at the property to rezone. The comment ID’s that relate to those comments are as followed below: [205, 377, 418, 543, 607, 717, 761, 1411, 1412, 1420, 1482, 1483, 1484, 1485, 1487, 1488, 1702, 1808, 1979, 1985, 2242, 3230, 3375].

Response: Mitigations are important for reducing wildfire risk in hazardous areas. FHSZ is intended for long term planning purposes; it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. As FHSZ measured potential hazard, it serves as the basis for needing mitigations.

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 84 comments stating, why even mitigating property if it does not count towards the zone classification of property. The comment ID's that relate to those comments are as followed below: [434, 452, 476, 498, 499, 515, 574, 579, 590, 606, 668, 690, 701, 757, 820, 825, 847, 894, 909, 918, 923, 1033, 1039, 1044, 1049, 1052, 1056, 1057, 1059, 1060, 1064, 1069, 1080, 1081, 1086, 1091, 1100, 1109, 1114, 1118, 1122, 1140, 1157, 1161, 1164, 1165, 1169, 1175, 1176, 1178, 1195, 1208, 1426, 1500, 1506, 1507, 1513, 1520, 1528, 1530, 1534, 1545, 1580, 1593, 1594, 1596, 1677, 1678, 1726, 1727, 1735, 1736, 1739, 1790, 1910, 2024, 2025, 2149, 2153, 2155, 2179, 2253, 2667, 2781].

Response: Mitigations are important for reducing wildfire risk in hazardous areas as identified by FHSZ. Higher hazard implies that compared to other areas of the state, a fire is either more likely to occur, could occur with more intense fire behavior, or both. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk, not a measure of whether or not mitigations have been done. FHSZ is intended for long term planning purposes; it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. Thus, FHSZ zoning justifies the mitigation actions.

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 118 comments concerned with why vineyards, citrus and avocado orchards have an FHSZ score. The comment ID's that relate to those comments are as followed below: [69, 109, 551, 612, 613, 614, 664, 791, 805, 811, 977, 1010, 1120, , 137, 1148, 1193, 1198, 1478, 1479, 1480, 1481, 1497, 1501, 1597, 1768, 1769, 1776, 1777, 1781, 1782, 1785, 1786, 1789, 1793, 1796, 1797, 1804, 1809, 1810, 1816, 1818, 1825, 1881, 1887, 1893, 1898, 1899, 1900, 1901, 1904, 1968, 1973, 1988, 1989, 1991, 1993, 1994, 1995, 1996, 1998, 1999, 2002, 2003, 2004, 2006, 2009, 2010, 2011, 2012, 2013, 2015, 2017, 2018, 2019, 2020, 2021, 2023, 2026, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2037, 2038, 2039, 2041, 2042, 2080, 2108, 2150, 2201, 2222, 2248, 2275, 2284, 2295, 2666, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2680, 3229, 3231, 3362, 3366, 3367, 3589].

Response: Recent wildfires have resulted in damage and structure loss to within agricultural areas. The main mechanism of hazard in these areas is ember transport from adjacent wildland, but many agriculturally managed lands (vineyards, orchards, grazing, and other types), do contain modest fine fuels allowing for fire spread. The fire prevention regulations that go with FHSZ zoning are appropriate to mitigate fire risk in these lands where adjacent wildlands produce firebrands capable of vectoring fire into them.

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 2 comments asking why the property next to the property had a different zone classification. The comment ID's that relate to those comments are as followed: [1675, 1953].

Response: In non-wildland areas, zone edges occur based on distance to the wildland edge. Because hazard in these areas is largely determined by incoming embers from adjacent wildland, urban areas that are similar in vegetation type and housing density may have a change in FHSZ class as the distance to the wildland edge increases. Areas immediately adjacent to wildland receive the same FHSZ score as that wildland where fire originates, and the model then produces lower scores as the distance to wildland edge increases. In wildland areas, zone edges are a result of the way zones are delineated. Specifically, zones represent areas of similar slope and fuel potential. Zone boundaries divide zones based on geographic and vegetation features that align

with fire hazard potential; although, at a local scale, it may appear that the immediate area is similar on both sides of the edge. The class value within a zone is based on the average hazard score across the whole zone, so areas that are in the same zone but not immediately adjacent to a local area can have an influence on the final zone classification.

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 79 comments asking why recent fires are not included in the model. The comment ID’s that relate to those comments are as followed below: [236, 497, 544, 547, 549, 550, 554, 583, 601, 604, 673, 675, 677, 678, 681, 747, 802, 803, 865, 919, 928, 947, 948, 1006, 1046, 1095, 1096, 1097, 1098, 1103, 1110, 1111, 1113, 1191, 1274, 1286, 1287, 1288, 1382, 1383, 1392, 1670, 2057, 2145, 2282, 2316, 2329, 2371, 2648, 2656, 2658, 2659, 2663, 2752, 2753, 2754, 2755, 2756, 2757, 2758, 2779, 2784, ,2785 ,2786, 2787, 2788, 2789, 2790, 2791, 2792, 2793, 2794, 2795, 2796, 3232, 3343, 3344, 3345, 3445].

Response: Recent fires (through 2020) do factor into burn probability in the model, as they reflect trends in fire likelihood within similar climate and fuel groupings. Like other temporary mitigations such as fuel treatments, the effect of wildfires on fuel loads is limited due to vegetation regrowth or type conversion. Because some of the most critical fire safety regulations involve construction materials and methods, which are influential over the entire life of a structure, FHSZ utilizes fuel conditions that reflect the maximal hazard condition likely to occur over a 30-50 year time horizon.

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 34 comments asking why defensible space and home hardening do not factor into the maps. The comment ID’s that relate to those comments are as followed below: [808, 878, 892, 901, 903, 927, 1024, 1418, 1441, 1713, 1723, 1911, 1982, 1987, 2104, 2105, 2113, 2142, 2143, 2148, 2154, 2186, 2193, 2199, 2209, 2220, 2226, 2231, 2233, 2257, 2649, 2650, 2665, 3276].

Response: Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk. Higher hazard implies that compared to other areas of the state, a fire is either more likely to occur, would occur with more intense fire behavior, or both. Because FHSZ is intended for long term planning purposes it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. Home hardening is considered a risk reduction method to reduce the impacts of the hazard. Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are to impacts. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk (such as the California Wildfire Mitigation Program).

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 34 comments asking why defensible space, home hardening and being a part of a Firewise community does not lower/eliminate the zone classification. The comment ID’s that relate to those comments are as followed below: [2114, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2177, 2180, 2181, 2182, 2187, 2188, 2189, 2192, 2202, 2214, 2215, 2237, 2249, 2264, 2283, 2288, 2309, 2310, 2320, 2330, 2350, 2361, 2447, 3227, 3349].

Response: Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are. FHSZ is a tool that can help

identify where actions should be taken to mitigate fire risk. Higher hazard implies that compared to other areas of the state, a fire is either more likely to occur, would occur with more intense fire behavior, or both. Because FHSZ is intended for long term planning purposes it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. Home hardening is considered a risk reduction method to reduce the impacts of the hazard. Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are to impacts. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk (such as the California Wildfire Mitigation Program).

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 2 comments asking why defensible space, home hardening, burn scar and being a part of a Firewise community does not lower/eliminate the zone classification. The comment ID's that relate to those comments are as followed: [2646, 3055].

Response: Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk. Higher hazard implies that compared to other areas of the state, a fire is either more likely to occur, would occur with more intense fire behavior, or both. Because FHSZ is intended for long term planning purposes it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. Home hardening is considered a risk reduction method to reduce the impacts of the hazard. Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are to impacts. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk (such as the California Wildfire Mitigation Program). Recent fires (through 2020) do factor into burn probability in the model, as they reflect trends in fire likelihood within similar climate and fuel groupings. Like other temporary mitigations such as fuel treatments, the effect of wildfires on fuel loads is limited due to vegetation regrowth or type conversion. Because some of the most critical fire safety regulations involve construction materials and methods, which are influential over the entire life of a structure, FHSZ utilizes fuel conditions that reflect the maximal hazard condition likely to occur over a 30-50 year time horizon.

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 17 comments asking why defensible space, fuel reduction and being part of a Firewise community does not lower/eliminate a zone classification. The comment ID's that relate to those comments are as followed below: [1146, 1183, 1184, 1185, 1187, 1188, 1189, 1190, 1192, 1199, 1200, 1203, 1204, 1417, 2141, 2271, 2299].

Response: Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk. Higher hazard implies that compared to other areas of the state, a fire is either more likely to occur, would occur with more intense fire behavior, or both. Because FHSZ is intended for long term planning purposes it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are to damage. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk. Firewise

community activities are targeted at reducing the risk to communities from the associated hazard and are consequently almost always in communities that have FHSZ zones in them.

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 1 comment asking why defensible space, fuel reduction, being part of a Firewise community, and being a vineyard, citrus or avocado area and does not lower zone classification. The comment ID that relates to this comment is as followed: [2054].

Response: Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk. Higher hazard implies that compared to other areas of the state, a fire is either more likely to occur, would occur with more intense fire behavior, or both. Because FHSZ is intended for long term planning purposes it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are to damage. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk. Firewise community activities are targeted at reducing the risk to communities from the associated hazard and are consequently almost always in communities that have FHSZ zones in them. Recent wildfires have resulted in damage and structure loss to within agricultural areas. The main mechanism of hazard in these areas is ember transport from adjacent wildland, but many agriculturally managed lands (vineyards, orchards, grazing, and other types), do contain modest fine fuels allowing for spread. The fire prevention regulations that go with FHSZ zoning are appropriate to mitigate fire risk in these lands where adjacent wildlands produce firebrands capable of vectoring fire into them.

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 1 comment asking why defensible space, fuel reduction being part of a Firewise community, and burn scar and does not lower/eliminate zone classification. The comment ID that relates to this comment is as followed: [3352].

Response: Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk. Higher hazard implies that compared to other areas of the state, a fire is either more likely to occur, would occur with more intense fire behavior, or both. Because FHSZ is intended for long term planning purposes it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are to damage. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk. Firewise community activities are targeted at reducing the risk to communities from the associated hazard and are consequently almost always in communities that have FHSZ zones in them. Recent fires (through 2020) do factor into burn probability in the model, as they reflect trends in fire likelihood within similar climate and fuel groupings. Like other temporary mitigations such as fuel treatments, the effect of wildfires on fuel loads is limited due to vegetation regrowth or type conversion. Because some of the most critical fire safety regulations involve construction materials and methods, which are influential over the entire life of a

structure, FHSZ utilizes fuel conditions that reflect the maximal hazard condition likely to occur over a 30-50 year time horizon.

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 3 comments asking the State Fire Marshal to come survey the property when completed defensible space and fuel reduction work. The comment ID's that relate to those comments are as followed below: [924, 2321, 2332].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk. Higher hazard implies that compared to other areas of the state, a fire is either more likely to occur, would occur with more intense fire behavior, or both. Because FHSZ is intended for long term planning purposes it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. Mitigations are important for reducing wildfire risk in hazardous areas as identified by FHSZ. Higher hazard implies that compared to other areas of the state, a fire is either more likely to occur, could occur with more intense fire behavior, or both. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk, not a measure of whether or not mitigations have been done. FHSZ is intended for long term planning purposes; it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. Thus, FHSZ zoning justifies the mitigation actions.

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 1 comment asking why complete defensible space and fuel reduction work, if located on a vineyard, citrus, or avocado area. The comment ID that relates to this comment is as followed: [2984].

Response: Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk. Higher hazard implies that compared to other areas of the state, a fire is either more likely to occur, would occur with more intense fire behavior, or both. Because FHSZ is intended for long term planning purposes it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. Recent wildfires have resulted in damage and structure loss to within agricultural areas. The main mechanism of hazard in these areas is ember transport from adjacent wildland, but many agriculturally managed lands (vineyards, orchards, grazing, and other types), do contain modest fine fuels allowing for spread. The fire prevention regulations that go with FHSZ zoning are appropriate to mitigate fire risk in these lands where adjacent wildlands produce firebrands capable of vectoring fire into them.

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 2 comments asking why defensible space, fuel reduction and burn scar does not lower/eliminate zone classification. The comment ID's that relate to those comments are as followed: [327, 763].
Response: Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk. Higher hazard implies that compared

to other areas of the state, a fire is either more likely to occur, would occur with more intense fire behavior, or both. Because FHSZ is intended for long term planning purposes it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. Recent fires (through 2020) do factor into burn probability in the model, as they reflect trends in fire likelihood within similar climate and fuel groupings. Like other temporary mitigations such as fuel treatments, the effect of wildfires on fuel loads is limited due to vegetation regrowth or type conversion. Because some of the most critical fire safety regulations involve construction materials and methods, which are influential over the entire life of a structure, FHSZ utilizes fuel conditions that reflect the maximal hazard condition likely to occur over a 30-50 year time horizon.

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 2 comments asking why home hardening and being part of a Firewise community does not lower/eliminate zone classification. The comment ID's that relate to those comments are as followed: [1602, 1669].

Response: Home hardening is considered a risk reduction method to reduce the impacts of the hazard. Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are to impacts. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk (such as the California Wildfire Mitigation Program). Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are to damage. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk. Firewise community activities are targeted at reducing the risk to communities from the associated hazard and are consequently almost always in communities that have FHSZ zones in them.

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 1 comment asking why home hardening does not reduce hazard and if the State Fire Marshal would come look at the property since it has been mitigated. The comment ID that relates to this comment is as followed: [1715].

Response: Home hardening is considered a risk reduction method to reduce the impacts of the hazard. Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are to impacts. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk (such as the California Wildfire Mitigation Program). Mitigations are important for reducing wildfire risk in hazardous areas. FHSZ is intended for long term planning purposes; it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. As FHSZ measured potential hazard, it serves as the basis for needing mitigations.

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 1 comment asking why home hardening and burn scars are not factored into zone classification. The comment ID that relates to this comment is as followed: [3449].

Response: Home hardening is considered a risk reduction method to reduce the impacts of the hazard. Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are to impacts. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk (such as the California

Wildfire Mitigation Program). Recent fires (through 2020) do factor into burn probability in the model, as they reflect trends in fire likelihood within similar climate and fuel groupings. Like other temporary mitigations such as fuel treatments, the effect of wildfires on fuel loads is limited due to vegetation regrowth or type conversion. Because some of the most critical fire safety regulations involve construction materials and methods, which are influential over the entire life of a structure, FHSZ utilizes fuel conditions that reflect the maximal hazard condition likely to occur over a 30-50 year time horizon.

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 41 comments asking if the community is a Firewise community and will the State Fire Marshal come out and look at the property to lower the zone classification. The comment ID's that relate to those comments are as followed below: [1909, 2046, 2050, 2051, 2072, 2088, 2111, 2157, 2159, 2162, 2165,2185, 2238, 2243, 2247, 2252, 2259, 2262, 2269, 2274, 2296, 2323, 2324, 2353, 2355, 2356, 2366, 2678, 2679, 2712, 2713, 2714, 2715, 2717, 2718, 2719, 2720, 2721, 2722, 2724, 2725].

Response: Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are to damage. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk. Firewise community activities are targeted at reducing the risk to communities from the associated hazard and are consequently almost always in communities that have FHSZ zones in them. Mitigations are important for reducing wildfire risk in hazardous areas. FHSZ is intended for long term planning purposes; it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. As FHSZ measured potential hazard, it serves as the basis for needing mitigations.

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 2 comments requesting the State Fire Marshal will come look at the mitigated property, and if why even mitigate property if the mitigations measures does not lower/eliminate zone classification. The comment ID's that relate to those comments are as followed: [719, 1791].

Response: Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are to damage. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk. Firewise community activities are targeted at reducing the risk to communities from the associated hazard and are consequently almost always in communities that have FHSZ zones in them. Mitigations are important for reducing wildfire risk in hazardous areas as identified by FHSZ. Higher hazard implies that compared to other areas of the state, a fire is either more likely to occur, could occur with more intense fire behavior, or both. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk, not a measure of whether or not mitigations have been done. FHSZ is intended for long term planning purposes; it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. Thus, FHSZ zoning justifies the mitigation actions.

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 2 comments asking if part of a Firewise Community and a recent burn scar, will the State Fire Marshal lower the zone classification. The comment ID's that relate to those comments are as followed: [1725, 3050].

Response: Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are to damage. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk. Firewise community activities are targeted at reducing the risk to communities from the associated hazard and are consequently almost always in communities that have FHSZ zones in them. Recent fires (through 2020) do factor into burn probability in the model, as they reflect trends in fire likelihood within similar climate and fuel groupings. Like other temporary mitigations such as fuel treatments, the effect of wildfires on fuel loads is limited due to vegetation regrowth or type conversion. Because some of the most critical fire safety regulations involve construction materials and methods, which are influential over the entire life of a structure, FHSZ utilizes fuel conditions that reflect the maximal hazard condition likely to occur over a 30-50 year time horizon.

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 16 comments asking if the State Fire Marshal will come look at the mitigated property as the property is located on a vineyard, citrus or avocado area. The comment ID's that relate to those comments are as followed below: [541, 556, 559, 568, 581, 704, 772, 821, 921, 1151, 1394, 1395, 3030, 3146, 3240, 3546].

Response: Mitigations are important for reducing wildfire risk in hazardous areas. FHSZ is intended for long term planning purposes; it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. As FHSZ measured potential hazard, it serves as the basis for needing mitigations. Recent wildfires have resulted in damage and structure loss to within agricultural areas. The main mechanism of hazard in these areas is ember transport from adjacent wildland, but many agriculturally managed lands (vineyards, orchards, grazing, and other types), do contain modest fine fuels allowing for spread. The fire prevention regulations that go with FHSZ zoning are appropriate to mitigate fire risk in these lands where adjacent wildlands produce firebrands capable of vectoring fire into them.

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 1 comment asking why vineyard, avocado or citrus property does not lower/eliminate zone classification, when the neighboring property has a lower zone classification. The comment ID that relates to this comment is as followed: [3547].

Response: Recent wildfires have resulted in damage and structure loss to within agricultural areas. The main mechanism of hazard in these areas is ember transport from adjacent wildland, but many agriculturally managed lands (vineyards, orchards, grazing, and other types), do contain modest fine fuels allowing for spread. The fire prevention regulations that go with FHSZ zoning are appropriate to mitigate fire risk in these lands where adjacent wildlands produce firebrands capable of vectoring fire into them. In non-wildland areas, zone edges occur based on distance to the wildland edge. Because hazard in these areas is largely determined by incoming embers from adjacent wildland, urban areas that are similar in vegetation type and housing density may have a change in FHSZ class as the distance to the wildland edge increases. Areas immediately adjacent to wildland receive the same FHSZ score as that wildland where fire originates, and the model then produces lower scores as the distance to wildland edge increases. In wildland areas, zone edges are a result of the way zones are delineated. Specifically, zones represent areas of similar slope and fuel potential. Zone boundaries divide zones based on

geographic and vegetation features that align with fire hazard potential; although, at a local scale, it may appear that the immediate area is similar on both sides of the edge. The class value within a zone is based on the average hazard score across the whole zone, so areas that are in the same zone but not immediately adjacent to a local area can have an influence on the final zone classification.

Overview: Mitigation and Fuel Reduction – The Office of the State Fire Marshal received 1 comment asking why vineyard, avocado or citrus property does not lower zones and the model should factor in burn scar, thus lowering/eliminating a zone classification. The comment ID that relates to this comment is as followed: [2325].

Response: Recent wildfires have resulted in damage and structure loss to within agricultural areas. The main mechanism of hazard in these areas is ember transport from adjacent wildland, but many agriculturally managed lands (vineyards, orchards, grazing, and other types), do contain modest fine fuels allowing for spread. The fire prevention regulations that go with FHSZ zoning are appropriate to mitigate fire risk in these lands where adjacent wildlands produce firebrands capable of vectoring fire into them. Project timelines may be uncertain and variable, therefore wildland areas targeted for development are not considered part of the non-wildland until construction has begun. In cases where development replaces agriculture use, the area is already zoned as non-wildland.

Comment(s) Insurance Response

Overview: Insurance Comments

Overview: Insurance – The Office of the State Fire Marshal received 74 comments asking if the new fire hazard severity zones affect the ability to purchase or maintain insurance. The comment ID's that relate to those comments are as followed below: [80, 224, 270, 274, 282, 375, 399, 418, 434, 446, 447, 476, 499, 515, 546, 552, 562, 589, 610, 684, 692, 702, 823, 978, 1022, 1044, 1046, 1091, 1122, 1441, 1586, 1660, 1740, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2177, 2180, 2181, 2182, 2187, 2188, 2189, 2192, 2202, 2214, 2215, 2249, 2271, 2283, 2284, 2295, 2305, 2310, 2320, 2330, 2350, 2367, 2447, 2512, 2658, 2695, 2956, 3227, 3229, 3231, 3275, 3349, 3406].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Insurance companies use risk models, which differ from hazard models, because they consider the susceptibility of a structure to damage from fire and other short-term factors that are not included in hazard modeling. It is unlikely that insurance risk models specifically call out CAL FIRE Fire Hazard Severity Zones as a factor, but much of the same data that is used in the fire hazard severity zone model are likely included in the insurance companies' risk models. However, insurance risk models incorporate many additional factors and factors that change more frequently than those that CAL FIRE includes in its hazard mapping, which is built to remain steady for the next 10+ years.

Overview: Insurance – The Office of the State Fire Marshal received 334 comments asking if the updated CAL FIRE maps will affect insurance availability and affordability. The comment ID's that relate to those comments are as followed below: [27, 36, 41, 42, 78, 79, 231, 240, 266,

281, 284, 292, 293, 327, 421, 429, 433, 438, 441, 454, 459, 555, 556, 559, 567, 568, 571, 578, 590, 601, 606, 612, 613, 679, 680, 689, 690, 704, 717, 723, 737, 738, 741, 755, 756, 761, 791, 795, 796, 821, 825, 830, 878, 892, 901, 903, 906, 946, 998, 1011, 1012, 1016, 1018, 1039, 1064, 1075, 1102, 1104, 1108, 1109, 1111, 1112, 1113, 1148, 1181, 1401, 1407, 1409, 1412, 1420, 1426, 1431, 1433, 1436, 1472, 1497, 1501, 1517, 1529, 1531, 1532, 1571, 1575, 1580, 1588, 1589, 1602, 1604, 1605, 1606, 1639, 1668, 1674, 1675, 1680, 1705, 1718, 1722, 1728, 1768, 1769, 1776, 1777, 1782, 1783, 1785, 1786, 1789, 1793, 1796, 1797, 1804, 1807, 1808, 1809, 1810, 1812, 1816, 1818, 1825, 1828, 1858, 1861, 1863, 1866, 1868, 1876, 1883, 1884, 1885, 1887, 1895, 1896, 1898, 1899, 1900, 1902, 1908, 1909, 1912, 1942, 1967, 1968, 1970, 1973, 1975, 1978, 1979, 1981, 1982, 1986, 1987, 1988, 1989, 1991, 1993, 1994, 1995, 1996, 1998, 1999, 2002, 2003, 2004, 2006, 2008, 2009, 2010, 2011, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2023, 2026, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2041, 2042, 2043, 2046, 2047, 2050, 2051, 2072, 2080, 2088, 2092, 2104, 2108, 2111, 2112, 2113, 2127, 2139, 2140, 2143, 2148, 2149, 2150, 2151, 2152, 2154, 2157, 2161, 2162, 2163, 2164, 2165, 2185, 2190, 2201, 2204, 2208, 2209, 2219, 2222, 2224, 2226, 2229, 2231, 2233, 2238, 2240, 2242, 2243, 2248, 2252, 2254, 2255, 2257, 2258, 2261, 2262, 2269, 2274, 2286, 2288, 2289, 2290, 2293, 2297, 2303, 2304, 2308, 2312, 2313, 2321, 2323, 2324, 2326, 2327, 2332, 2334, 2336, 2337, 2340, 2353, 2355, 2356, 2360, 2361, 2366, 2370, 2457, 2646, 2647, 2648, 2656, 2657, 2659, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 2679, 2680, 2702, 2712, 2713, 2714, 2715, 2717, 2718, 2719, 2720, 2721, 2722, 2723, 2724, 2725, 2751, 2989, 3009, 3053, 3146, 3362, 3366, 3367, 3563, 3564, 3589].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. CAL FIRE’s maps are intended to drive local planning decisions, not insurance decisions. Under Commissioner Lara’s new regulation finalized in October 2022, insurance companies must provide discounts for wildfire safety actions such as community mitigation and home-hardening, which CAL FIRE’s maps do not assess. In addition, insurance companies are already using risk analysis tools and models that go beyond CAL FIRE’s proposed maps in determining what properties they will underwrite. Commissioner Lara’s new wildfire safety regulation will help increase access to insurance by promoting wildfire safety across the state. Reducing wildfire risks throughout the state is the primary way we can make insurance more available and affordable, and our regulation is a major step towards that goal. CAL FIRE’s maps support that goal through improving public education about hazard and the need for safety preparation.

Overview: Insurance – The Office of the State Fire Marshal received 217 comments asking if a homeowner and the zone changed from no zone to a Moderate or a High Hazard or to Very High Hazard, will impact insurance premiums or renewal ability. The comment ID’s that relate to those comments are as followed below: [419, 435, 437, 542, 544, 547, 549, 550, 554, 558, 576, 582, 583, 587, 588, 596, 599, 607, 664, 669, 675, 734, 735, 747, 757, 763, 771, 802, 813, 815, 820, 824, 848, 865, 907, 919, 927, 928, 947, 948, 949, 950, 951, 983, 987, 989, 990, 994, 997, 1003, 1006, 1008, 1010, 1013, 1014, 1015, 1017, 1020, 1021, 1023, 1024, 1029, 1030, 1033, 1034, 1037, 1041, 1047, 1049, 1050, 1052, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1067, 1069, 1073, 1074, 1078, 1079, 1080, 1081, 1086, 1087, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1100, 1103, 1105, 1110, 1118, 1129, 1134, 1135, 1138, 1139, 1144, 1145, 1153, 1154, 1156, 1160, 1161, 1164, 1165, 1169, 1175, 1176, 1178, 1184, 1191, 1195, 1201, 1205, 1208, 1274, 1286, 1287, 1288, 1382, 1383, 1392, 1400, 1418, 1422, 1481, 1500, 1503, 1506,

1507, 1511, 1513, 1515, 1520, 1521, 1523, 1527, 1528, 1530, 1534, 1545, 1584, 1593, 1594, 1596, 1656, 1670, 1700, 1702, 1709, 1723, 1725, 1735, 1736, 1739, 1790, 1791, 1798, 1819, 1855, 1888, 1950, 1962, 1972, 1985, 1997, 2045, 2057, 2142, 2145, 2153, 2179, 2193, 2199, 2280, 2282, 2291, 2322, 2629, 2752, 2753, 2754, 2755, 2756, 2757, 2758, 2779, 2784, 2785, , 2786, 2787, 2788, 2789, 2790, 2791, 2792, 2793, 2794, 2795, 2796, 3050, 3232, 3343, 3344, 3345, 3352, 3449].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. For many years, insurance companies have been using alternate wildfire risk tools for determining where they will write and renew policies, and how much premium to charge a policyholder, not the Fire Hazard Severity Zone maps. Therefore, a change in designation on the maps for a single homeowner is unlikely to affect their insurance. The reality is that more accurate risk information enables homeowners and communities to reduce their wildfire risks, and Commissioner Lara’s new wildfire mitigation regulation clarifies what actions you should take to reduce wildfire risks. Once that regulation is fully implemented, if a homeowner or business owner takes those risk mitigation actions, they will be able to see a discount in their insurance premium.

Overview: Insurance – The Office of the State Fire Marshal received 13 comments asking how the state is addressing wildfire mitigation. The comment ID’s that relate to those comments are as followed below: [417, 682, 693, 719, 808, 894, 918, 1076, 1388, 1886, 1971, 2114, 3281].

Response: By design, CAL FIRE’s maps are focused on long-range wildfire hazard, which includes only certain variables, like wind, vegetation, ember production and movement, climate, topography, and fire history. CAL FIRE’s maps will give up to date information to communities about the level of wildfire hazard they face, which could help target resources at the state and local level. Expanded state grant programs and Commissioner Lara’s new wildfire safety regulation are aimed at reducing wildfire risks to communities through programs such as Firewise USA and the new Fire Risk Reduction Community designation from the California Board of Forestry and Fire Protection.

Overview: Insurance – The Office of the State Fire Marshal received 12 comments asking how the maps will affect insurance availability, affordability, and how the change in zones will affect the insurance premiums and renewal ability. The comment ID’s that relate to those comments are as followed below: [451, 2105, 2220, 2237, 2264, 2302, 2371, 2372, 2649, 2650, 2663, 3136].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. CAL FIRE’s maps are intended to drive local planning decisions, not insurance decisions. Under Commissioner Lara’s new regulation finalized in October 2022, insurance companies must provide discounts for wildfire safety actions such as community mitigation and home-hardening, which CAL FIRE’s maps do not assess. In addition, insurance companies are already using risk analysis tools and models that go beyond CAL FIRE’s proposed maps in determining what properties they will underwrite. Commissioner Lara’s new wildfire safety regulation will help increase access to insurance by promoting wildfire safety across the state. Reducing wildfire risks throughout the state is the primary way we can make insurance more available and affordable, and our regulation is a major step towards that goal. CAL FIRE’s maps support that goal through improving public education about hazard and the need for safety preparation. For many years, insurance companies have been using alternate wildfire risk tools for determining where they will write and renew policies, and how much

premium to charge a policyholder, not the Fire Hazard Severity Zone maps. Therefore, a change in designation on the maps for a single homeowner is unlikely to affect their insurance. The reality is that more accurate risk information enables homeowners and communities to reduce their wildfire risks, and Commissioner Lara's new wildfire mitigation regulation clarifies what actions you should take to reduce wildfire risks. Once that regulation is fully implemented, if a homeowner or business owner takes those risk mitigation actions, they will be able to see a discount in their insurance premium.

Comment(s): Change Zone Response

Overview: Change Zone Comments

Overview: Change Zone Comment: The Office of the State Fire Marshal received 80 comments from the jurisdictional location of Crest, California in which the community requested we change their zone to the zone of 2007 Fire Hazard Severity Zone Map, which was classified as moderate. The comment ID's that relate to those comments are as followed below: [546, 949, 950, 951, 983, 987, 989, 990, 994, 997, 1003, 1014, 1028, 1030, 1033, 1034, 1037, 1041, 1050, 1052, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1069, 1073, 1074, 1078, 1079, 1080, 1081, 1086, 1087, 1092, 1093, 1094, 1105, 1134, 1135, 1139, 1144, 1145, 1154, 1156, 1160, 1161, 1164, 1165, 1175, 1178, 1195, 1201, 1208, 1503, 1506, 1507, 1511, 1513, 1515, 1520, 1521, 1523, 1527, 1528, 1530, 1534, 1545, 1575, 1584, 1593, 1594, 1596, 1735, 1736, 1739, 1790].

Response: No changes were made to the regulation in response to these comments. The 2007 map has this area in mostly Very High with some High FHSZ in the community interior; there is no Moderate FHSZ as suggested in the comment. There is very significant fire history in the area, including both the Laguna and Cedar Fires that burned through the community. The developed area is only about 0.5 miles in width, with wildland on all sides. Due to high burn probability and Santa Ana winds, this results in the entire urban area falling within the Very High hazard zone.

Overview: Change Zone Comment: The Office of the State Fire Marshal received 16 comments that requested a change of zone based on a specific commenters area based on burn probability and climate. The comment ID's that relate to those comments are as followed below: [(San Bernadino County: 1419, 1433, 2007, 2058, 2139, 2166, 2204, 2207, 2289, 2294, 2301, 2303, 2312, 2313, 2326 & 2327)].

Response: CAL FIRE adjusted FHSZ in these areas, where necessary, to better match the climate and burn probability of the local area.

Overview: Change Zone Comment: The Office of the State Fire Marshal received 8 comments that requested a change of zone based on a specific commenters area based on land use and wildland fuels. The comment ID's that relate to those comments are as followed below: [(San Luis Obispo County: 718, 1789, 1816, 1893, 1900, 2150, & 2248) & (Los Angels County: 2650)].

Response: CAL FIRE adjusted FHSZ in these areas, where necessary, to better reflect current land use and wildland fuels.

Overview: Change Zone Comment: The Office of the State Fire Marshal received 18 comments that requested a change of zone based on a specific commenters area. The comment ID's that relate to those comments are as followed below: [(Amador County: 1129), (El Dorado County: 1064), (Los Angeles County: 2349), (San Diego County: 3091), (Santa Cruz County: 1426, 1577, 1911 & 2690), (Sonoma County: 805, 1148, 1151, 2022, 2051, 2200 & 2275), (Trinity County: 1715), (Tuolumne County: 1979) & (Nevada County: 3406)].

Response: No changes were made to the regulation in response to these comments. CAL FIRE reviewed the zoning and underlying data in these areas, where necessary and determined that hazard was appropriately classified.

Overview: Change Zone Comment: The Office of the State Fire Marshal received 2 comments that requested a change of zone based on a specific vegetation in an area. The comment ID's that relate to those comments are as followed: [(Sonoma County: 760) & (Trinity County: 1715)].

Response: No changes were made to the regulation in response to these comments. CAL FIRE reviewed the zoning and underlying data in these areas and determined that hazard was appropriately classified based on the vegetation composition and burn probability.

Overview: Change Zone Comment: The Office of the State Fire Marshal received 5 comments that requested a change of zone based on a specific commenters area based on vegetation composition, slope burn probability and wind direction. The comment ID's that relate to those comments are as followed below: [(Ventura County: 2341, 2342, 2343, 2345, 2348)].

Response: No changes were made to the regulation in response to these comments. CAL FIRE reviewed the zoning and underlying data in these areas and determined that hazard was appropriately classified based on the vegetation composition, slope, burn probability, and the dominant direction of fire winds modeled in this area.

Overview: Change Zone Comment: The Office of the State Fire Marshal received 2 comments that requested a change of zone based on a specific commenters area based on if the area was considered wildland. The comment ID's that relate to those comments are as followed: [Lake County: 1709 & 1890)].

Response: No changes were made to the regulation in response to these comments. CAL FIRE reviewed the zoning and underlying data in this area, including the non-wildland extent, and determined that hazard was appropriately classified.

Overview: Change Zone Comment: The Office of the State Fire Marshal received 15 comments from the jurisdictional location of Lake, California in which the community requested a change of their zone. The comment ID's that relate to those comments are as followed: [755, 756, 762, 815, 1137, 1146, 1172, 1179, 1182, 1187, 1188, 1189, 1190, 1192, 1417].

Response: No changes were made to the regulation in response to these comments. CAL FIRE reviewed the zoning and underlying data in this area, including the non-wildland extent, and determined that hazard was appropriately classified. The area in question is zoned as non-wildland.

Overview: Change Zone Comment: The Office of the State Fire Marshal received 9 comments that requested a change of zone based on the surrounding areas that are zoned differently. The

comment ID's that relate to those comments are as followed below: [(Contra Costa County: 3228), (El Dorado County: 946), (Madera County: 201), (Monterey County: 702), (Placer County: 111, 196 & 761), (San Diego County: 1497) & (Sonoma County: 272)].

Response: No changes were made to the regulation in response to these comments. In non-wildland areas, zone edges occur based on distance to the wildland edge. Because hazard in these areas is largely determined by incoming embers from adjacent wildland, urban areas that are similar in vegetation type and housing density may have a change in FHSZ class as the distance to the wildland edge increases. Areas immediately adjacent to wildland receive the same FHSZ score as that wildland where fire originates, and the model then produces lower scores as the distance to wildland edge increases. In wildland areas, zone edges are a result of the way zones are delineated. Specifically, zones represent areas of similar slope and fuel potential. Zone boundaries divide zones based on geographic and vegetation features that align with fire hazard potential; although, at a local scale, it may appear that the immediate area is similar on both sides of the edge. The class value within a zone is based on the average hazard score across the whole zone, so areas that are in the same zone but not immediately adjacent to a local area can have an influence on the final zone classification.

Overview: Change Zone Comment: The Office of the State Fire Marshal received 2 comments that requested a change of zone based on future development. The comment ID's that relate to those comments are as followed: [(Riverside County: 2317) & (San Diego County: 2325)].

Response: No changes were made to the regulation in response to these comments. Project timelines may be uncertain and variable, therefore wildland areas targeted for development are not considered part of the non-wildland until construction has begun.

Overview: Change Zone Comment: The Office of the State Fire Marshal received 8 comments that requested a change of zone based on they do not want a zone, even though located in the State Responsibility Area. The comment ID's that relate to those comments are as followed below: [(Butte County: 375), (Kern County: 791), (Santa Cruz County: 816), (Sonoma County: 541, 704, 772 & 921) & (Ventura County: 440)].

Response: No changes were made to the regulation in response to these comments. Public Resource Code 4202; The State Fire Marshal shall classify lands within state responsibility areas into fire hazard severity zones. Each zone shall embrace relatively homogeneous lands and shall be based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have been identified by the department as a major cause of wildfire spread. Government Code 51178; The State Fire Marshal shall identify areas in the state as moderate, high, and very high fire hazard severity zones based on consistent statewide criteria and based on the severity of fire hazard that is expected to prevail in those areas. Moderate, high, and very high fire hazard severity zones shall be based on fuel loading, slope, fire weather, and other relevant factors including areas where winds have been identified by the Office of the State Fire Marshal as a major cause of wildfire spread.

Overview: Change Zone Comment: The Office of the State Fire Marshal received 2 comments that requested a change of zone based on land that is barren of trees. The comment ID's that relate to those comments are as followed: [(El Dorado County: 223& 270)].

Response: No changes were made to the regulation in response to these comments. The change in FHSZ here is due to methods to treat barren land the same as urban and build FHSZs with a

buffer routine that accounts for hazard originating in the adjacent wildland. CAL FIRE reviewed the zoning and underlying data in this area and determined that hazard was appropriately classified based on the vegetation composition and burn probability in the adjacent wildland.

Overview: Change Zone Comment: The Office of the State Fire Marshal received 2 comments from the local jurisdiction of Ramona, CA that requested a change of zone based on the Local Responsibility Area. The comment ID's that relate to those comments are as followed: [1855, 2224].

Response: No changes were made to the regulation in response to these comments. The majority of Ramona is an incorporated city and will be zoned in LRA; the SRA surrounding the town center includes Moderate, High and Very High Zones consistent with the FHSZ model and local conditions.

Overview: Change Zone Comment: The Office of the State Fire Marshal received 6 comments that requested a change of zone based on the Local Responsibility Area. The comment ID's that relate to those comments are as followed below: [(San Mateo County: 436) & (Los Angeles County: 1554, 1604, 2161, 2231 & 2270)].

Response: No changes were made to the regulation in response to these comments. The proposed regulation only designates Fire Hazard Severity Zones in the State responsibility Area. Once the regulation is effective, the identification process for the Local Responsibility Area will occur.

Individual: Change Zone Comments

ID 203: Comment: This is a 76 unit complex with 18 buildings that are very nicely maintained. Many areas are rocked in or have lawns. There is no wild vegetation and no seasonal weeds to be dealt with. The current proposed map splits our complex between moderate and high risk. We ask that you make the entire complex moderate risk. Thank You Marc Sobel President.

Response: No changes were made to the regulation in response to this comment. CAL FIRE reviewed the zoning and underlying data in this area and determined that hazard was appropriately classified based on the vegetation composition and burn probability. Buffers persist irrespective of jurisdictional and property boundaries in FHSZ modeling due to consistent mapping requirements across the State.

ID 793, Comment: Hello, Would you please clarify how the area of lower Crystal Falls lake in Sonora, California is shown as very high risk on the assessment maps? This area of Wasatch Mountain Road and the houses right near the small swimming lake (no houseboats or motorized boats ever allowed) are shown as red on the maps. This makes no sense with the actual conditions on the ground. Additionally it appears that other Crystal falls properties backing up to the undeveloped highly forested steep hillside are deemed lower fire risk. This also does not seem to reflect accurately the geographic realities of this specific area. I appreciate your attention to this matter. Genevieve Ceraban21676 Wasatch Mountain Road Sonora, CA 95370(209) 770-2569

Response: CAL FIRE adjusted FHSZ in this area to improve consistency in hazard mapping across similar fuels and fire likelihood.

ID 811: Comment: Office of the State Fire Marshall C/O: FHSZ Comments California Department of Forestry and Fire Protection P.O. Box 944246 Sacramento, CA 94244-2460 Dear Sir or Madam, As I reviewed the November 2022 draft Fire Hazard Assessment Map, I realized the accuracy of the analysis would be greatly improved by some additional information about the actual conditions on the ground. Looking at the portion of Valley Center that runs along Couser Canyon Road between SR-76 and Couser Way, an approximately 1.75 mile long stretch, one sees that the first ~0.75 miles is a very broad, flat valley floor. This area contains grazing, hay and agricultural fields that are irrigated, mowed and tilled during the dry and growing seasons and contains a very large year-round pond. The next mile contain a large pond, a medium-sized pond (both containing water year-round), 2 large residential cisterns and 1 Valley Center Water mainline connection, along with a handful of residential properties, including mine on the west end of that portion. Couser Canyon Creek, which runs year-round, goes throughout the entire stretch of land from SR-76 through Couser Way and beyond. In this section, the canyon hills are covered with avocado and orange groves which are irrigated year-round. There is a second Valley Center Water mainline connection further along Couser Way, but still within ~1 mile of my property. In addition, this area of Valley Center experiences winds that are, for the most part, significantly lower than those found in many other areas of Valley Center which, as you know, covers ~27 square miles. Thus, relying on average Valley Center wind speeds is highly misleading. The above-mentioned ponds are within ~0.5 miles of my property, as are the 2 cisterns and 1 Valley Center Water mainline connection. A portion of Couser Canyon Creek runs through my property and the second Valley Center Water connection is under 1 mile away. The hills roughly to the north and south of my property are covered with avocado groves that are irrigated year-round and I consistently maintain the recommended defensible space around my home, as do other neighbors. The above conditions add up to a reduced fire risk to begin with due to the year-round irrigation of the agricultural (hay/grazing/crops) fields and avocado/orange groves, and lower wind speeds. In addition, fire-fighting ability is also improved by the lower winds and the presence of 8 year-round water sources (3 ponds, 1 creek, 2 cisterns, 2 Valley Center Water main line connections) in the immediate area. (Note that conditions in this area have actually improved since your 2007 Fire Hazard Assessment due to -- at least -- the addition of 1 cistern. In addition, none of the other items noted above are any different than they were at the last assessment where most of this area had a much lower hazard rating than in the 2022 version.) In conclusion, for all the above reasons, the Fire Hazard for my property is not nearly as severe as indicated in your November 2022 Fire Hazard Map and I respectfully request that you reduce your hazard rating for my property accordingly. Failing to carefully evaluate the actual conditions in this area and to reflect them accurately in your rating is a severe disservice to the handful of homeowners within it. Respectfully, M. Craggs 10222 Deseret Road Valley Center, CA 92082760-451-9089

Response: No changes were made to the regulation in response to this comment. CAL FIRE reviewed the zoning and underlying data in this area and determined that hazard was appropriately classified based on the vegetation composition and burn probability. Residence referenced in the comment is ~150 m from large, steep block of chaparral; in this region due to winds and burn probability that arrangement results in a Very High designation.

ID 1219: Comment: Office of the State Fire Marshal California Department of Forestry and Fire Protection P.O. Box 944246 Sacramento, CA 94244-2460 Attn: Scott Witt, Deputy Chief fhszcomments@fire.ca.gov Re: Public Comment on Notice of Proposed Rulemaking – Fire

Hazard Severity Zones, 2022 Dear Deputy Chief Scott Witt, On behalf of the proponents of the South Camino Pablo Annexation Project, we submit these comments on the Notice of Proposed Rulemaking – Fire Hazard Severity Zones (“FHSZ”), 2022 prepared by CalFire.¹ The proponents of the South Camino Pablo Annexation Project object to the redesignation of the project site from a High Fire Hazard Severity Zone to a Very High Fire Hazard Severity Zone since the Project was previously analyzed under a Mitigated Negative Declaration which concluded that there would be no significant impacts to the area from wildfire.²

¹ Notice Of Proposed Rulemaking Action - Fire Hazard Severity Zones, 2022, STATE OF CALIFORNIA-THE RESOURCES AGENCY, last accessed Feb. 2, 2023.

² The South Camino Pablo Annexation Project, Mitigated Negative Declaration, Camino Pablo Subdivision MND-2020 FINAL, last accessed Feb. 2, 2023.

³ The South Camino Pablo Annexation Project, Mitigated Negative Declaration, at p. 179, Camino Pablo Subdivision MND-2020 FINAL, last accessed Feb. 2, 2023.

I. DESCRIPTION OF THE PROJECT The South Camino Pablo Annexation Project (“Project”) is located at Camino Pablo at Tharp Drive, Town of Moraga Assessor’s Parcel Number (“APN”) 258-290-023. The Project is proposing to develop an 8.5-acre residential subdivision of 13 single-family homes on the southern portion of the property as seen in Fig. 1. As the MND notes the Property is currently only designated as a High Fire Hazard Severity Zone.³ Office of the State Fire Marshal February 6, 2023 Page 2 Fig. 1 Project Outline II.

CALFIRE’S RULEMAKING ADJUSTS CURRENT DESIGNATIONS OF FIRE HAZARD SEVERITY ZONES The Office of the State Fire Marshal (“OSFM”) is proposing amendments to, and the relocation of, the regulation in 14 CCR, Section 1280, which designates FHSZ in State Responsibility Area (“SRA”). Within this section are referenced maps titled “Maps of the Fire Hazard Severity Zones (FHSZ) in State Responsibility Areas of California. November 21, 2022”.⁴ Notice of Proposed Rulemaking Action - Fire Hazard Severity Zones, 2022, STATE OF CALIFORNIA-THE RESOURCES AGENCY, last accessed Feb. 2, 2023. FHSZs are geographical areas (lands) designated pursuant to PRC Sections 4201- 4204 and classified as Very High, High or Moderate in SRA. Each zone is assigned one of these ratings to reflect the degree of severity of fire hazard that is expected to prevail in the zone. The zones are designated so that measures may be identified which will reduce the potential for losses to life, property, and resources from wildfire. Building standards are effectuated by the proposed FHSZ maps, meaning some building code requirements will depend on the hazard zone in which the building is located. While OSFM maps fire hazard severity for the entire State, the map/zones Office of the State Fire Marshal February 6, 2023, Page 3 proposed for adoption in this regulation apply only to the SRA.⁵ CalFire released the current draft redesignations in November of 2022.

⁵ Notice of Proposed Rulemaking Action - Fire Hazard Severity Zones, 2022, STATE OF CALIFORNIA-THE RESOURCES AGENCY, last accessed Feb. 2, 2023.

⁶ FHSZ Underlying Methodology, CalFire, last accessed Feb. 2, 2023, short_fhsz_methods_072022.pdf (ca.gov)

⁷ Notice of Proposed Rulemaking Action - Fire Hazard Severity Zones, 2022, STATE OF CALIFORNIA-THE RESOURCES AGENCY, last accessed Feb. 2, 2023; FHSZ Underlying Methodology, CalFire, last accessed Feb. 2, 2023, short_fhsz_methods_072022.pdf (ca.gov).

⁸ The South Camino Pablo Annexation Project, Mitigated Negative Declaration, at p. 180, Camino Pablo Subdivision MND-2020 FINAL, last accessed Feb. 2, 2023.

⁹ Id.

III. CALFIRE’S UNDERLYING ANALYSIS IN REDESIGNATING FIRE HAZARD SEVERITY ZONES ONLY FORECASTS THE “EXPECTED” SEVERITY AT SPECIFIC LOCATIONS CalFire released the underlying methodology for the redesignations and which takes into account vegetation type, slopes, watersheds, etc.⁶ This methodology notes how the risks differ between

wildland vs. non-wildlands and assigned module numbers 1 through 4 to categorize the type of risks present for each. While this methodology may be appropriate on a statewide basis when large swathes of land need to be designated the methodology notes that it “reflect[s] the degree of severity of fire hazard that is expected to prevail in the zone,” and thus may be incorrect when compared to site-specific analysis.⁷ IV. THE MND CONCLUDED THAT THERE WOULD BE NO SIGNIFICANT IMPACTS FROM WILDFIRE. As part of the CEQA process, the MND was required to review whether the Project would face significant impacts from wildfires. In this analysis the MND notes that “[t]he grassy slopes exposed to the prevailing westerly winds could contribute to the spread of a wildfire. However [...] the project site is not located in proximity to any substantial fuel sources (e.g., trees), and would receive first response fire protection from the Moraga-Orinda Fire District (MOFD), which has a fire station approximately 2 miles from the project site. Therefore, the project is not expected to expose the proposed homes or their residents to a significant risk of wildland fires. The project would have a less-than-significant impact due to exposure to wildland fires.”⁸ Additionally, the MND’s wildfire analysis concluded that “[t]he project site is fully served by existing roads, water supply, and fire-fighting services”, and “[w]hile a new street would be constructed from Camino Pablo to provide access to the proposed homes, the road would not exacerbate fire risk, and the potential impacts from its construction have been addressed.”⁹ Given Office of the State Fire Marshal February 6, 2023 Page 4 this site specific analysis demonstrating no significant impacts from wildfires, CalFire should take a second look at the redesignation of this site. V. CALFIRE SHOULD PRESERVE THE CURRENT DESIGNATION BECAUSE RECENT SITE-SPECIFIC ANALYSIS CONTRADICTS THE “EXPECTED” SEVERITY OF FIRE HAZARD AS IT RELATES TO THE PROJECT SITE. Given the MND’s analysis and conclusions that there would be less than significant impacts from wildfire, we request that CalFire maintain the current designation because recent site-specific analysis contradicts the “expected” severity of fire hazard as it relates to the Project site. Sincerely, FENNEMORE WENDEL Darien Key

Response: No changes were made to the regulation in response to this comment. CAL FIRE reviewed the zoning and underlying data in this area and determined that hazard was appropriately classified based on the vegetation composition and burn probability. The wind data used in FHSZ is different in this case than that in the fire study referenced in the email. The area may have predominantly west winds when looking at the entire set of wind data but the winds that occur under the worst conditions of fire weather on record in the area are predominately out of the NNE, with 86% occurring in the 10-20 mph class and 7% in the 20-30 mph class.

ID 2341, Comment: April 3, 2023 Office of the State Fire Marshal c/o: FHSZ Comments California Department of Forestry and Fire Protection P.O. Box 944246 Sacramento, CA 94244-2460 Draft Fire Hazard Severity Zone Maps (November 21, 2022) Irvine Company Comments Dear Chief Berlandt: The Irvine Company appreciates the opportunity to provide the following comments in relation to the California Department of Forestry and Fire Protection's ("CAL FIRE's") Draft Fire Hazard Severity Zone Maps dated November 21, 2022 (the "Draft FHSZ Maps"). This comment letter is divided into three (3) sections: Section A Introduction to the Irvine Company and the Irvine Ranch Section B Project Specific Comments Regarding the Draft FHSZ Maps Section C Requests of Current SRA Map Process and Forthcoming LRA Map Process Irvine Company traces its early roots to the 1860's with the initial formation of the Irvine Ranch, totaling 120,000 acres. Today, Irvine Company is a private real estate investment company governed by an independent Board of Directors. Irvine Company is respected for its

master planning and environmental stewardship of the Irvine Ranch in Orange County, including diversified operations throughout coastal California. Irvine Company brings to life neighborhoods and sustainable communities with a full range of housing, jobs, retail centers, schools, parks and open space. During the last 40 years, under Donald Bren's leadership and vision, the Irvine Company has professionally planned and master built the all-new City of Irvine and the Newport Coast, creating one of America's most desirable regions. The City of Irvine currently has a population of more than 300,000 growing to an estimated 325,000 people over the next 10 years, with an equal number of employment positions. Irvine Company is committed to long-term ownership and operations of a high-quality real estate portfolio, the breadth of which is unmatched in the industry. With each property positioned at the top of its class, the company's holdings consist of 129 million square feet and include more than 590 office buildings, 125 apartment communities with 65,000 units, 40 retail centers, one coastal resort, three golf courses, and five marinas. The company's investment property portfolio is largely located in Orange County, with about thirty-five percent of the portfolio located in Silicon Valley, San Diego, West Los Angeles, Chicago and New York City. As an environmental planner, Irvine Company has a long and successful history of land preservation. Irvine Company established one of California's largest nature preserves by permanently dedicating more than half of the Irvine Ranch- 57,500 acres - to open space and parklands. It is the only land in California to receive both the California State and United States National Natural Landmark designation. The Chairman of the Board of Directors of Irvine Company is Donald Bren.

Section B Project Specific Comments Regarding the Draft FHSZ Maps. The first concern we have is the age of the data being used in the calculations for the fire hazard severity zones. According to the information provided, the source of the fuels data is from the Vegetation CAL FIRE FRAP 2015 file (<http://map.dfg.ca.gov//metadata/dsl327.html>). As shown below in Figure 2, the data for the area of our current project in the City of Orange (adjacent to the SRA) includes fuels data from 1997. Several newer fuel layers are available within the Landfire database which are more current and more accurately reflect the current conditions. Our second concern is why the significant change from "Moderate" and "High" to "Very High" hazard classification in the SRA areas surrounding our project area. The State has indicated that, "The fire hazard severity model for wild/and fire has two key elements: probability of an area burning and expected fire behavior under extreme fuel and weather conditions. The zones reflect areas that have similar burn probabilities and fire behavior characteristics. The factors considered in determining fire hazard within wild/and areas are fire history, flame length, terrain, local weather, and potential fuel over a 50-year period. Outside of wild/ands, the model considers factors that might lead to buildings being threatened, including terrain, weather, urban vegetation cover, blowing embers, proximity to wild/and, fire history, and fire hazard in nearby wild/ands." If the fire hazard in the nearby wildland will be a consideration, we need to understand "why" the adjacent areas have been increased from "Moderate" and "High" to "Very High". Figure 3, on the above, provides a direct comparison. The Irvine Regional Park area is of specific quandary. This area is covered with mostly oak trees, the majority of the understory is replaced with irrigated grass. The park contains many parking lots, stables and other areas without wildland fuels. The Irvine Company donated the park lands 1897 and it has been a regional park ever since. In Figure 4, below, the relationship of the park to the project site is provided. The Regional Park serves as a "fuel break" for the project site and in the previous hazard maps, this was evident but not in the 2022 maps. While historic fires have burned around and spotted over the park, the age and condition of the park indicates that the park has not been consumed by these fires over the past 125 years. In the

past 103 years, the fire history records indicate that five large fires have burned over the Regional Park and Project site. The average return interval is just over 25 years for large fire activity. The Irvine Company understands that these areas are a part of the overall wildland hazard but question the outcome as being in the highest category available given the amount of fuel available, the fire history and the position of the Regional Park. (Name, year, Interval, Acres) No name, 1914, 18,759, Green River, 1948, 34 53,080, Paseo Grande, 1967, 19 51,076, Gypsum, 1982, 15, 20,142, Canyon II, 2017, 35, 9,198 = Average 25.8, 30,451. Figure 4 It is also worth noting that Irvine Regional Park has traditionally served as the Incident Command location for the Orange County Fire Authority when fighting wildland fires in the SRA. Thousands of fire and support personnel rely on the refuge provided by the park, its open spaces and tree canopy as a gateway to provide fire suppression to SRA fires. OCF A has invested significant time, energy and resources in planning and preparing for the continued use of the site as such. A final concern is that indication that the modeling uses the most extreme data points within the dataset. In the State Frequently Asked Questions, it states, "The updated model will adjust fire intensity scores based on the most extreme fire weather at a given location, considering temperature, humidity, and wind speed." Flood zones are not created using 1,000 year floods and it does not seem to be appropriate to use the 100th percentile for wind/weather data. The Fremont Canyon RAWS is located approximately 2.75 miles to the NE of the project site. A review of the data from the site for the past 10 years (2013 to 2022) is provided in Figure 6, on the next page. Of specific note is the difference between the 100th and 99th percentiles in terms of the wind speeds. Using the highest values the wind/gusts are 66 mph wind and 94 mph gusts. At the 99th percentile, the values are 35 mph wind and 54 mph gusts. The difference is significant. Wind data values only exceed 60 mph in 87,159 data points. The wind gust only exceeded 70 mph 0.1 % of the time. We would like to understand the wind/weather values used to create the new fire hazard zone ratings. It is also worthwhile to note for the record that the project site referenced herein represents the potential for the City of Orange completing fully one-third of its Regional Housing Needs Allocation (RHNA). At a time when cities are struggling to meet their share of the state's needed 2.5 million units of housing, this plan may jeopardize the achievement of the state's housing goals in the City of Orange. Section C Requests of Current SRA Map Process and Forthcoming LRA Map Process Revisions to Draft FHSZ Maps. In light of the information presented in this letter, the Irvine Company would request the following: 1. Use of more current data in the evaluation process. 2. Access to the assumptions used in the evaluation process before they are adopted. The current position related in the Frequently Asked Questions (FHSZ geospatial data files are currently not available during the adoption process. The regulation incorporates the map by reference, and it is presented as an accurate and tractable representation of the data; release of the data could compromise the integrity of the data causing misrepresentation of the map and regulation. Upon completion of this process, the FHSZ maps will become formally adopted; at that time geospatial data files will become available.) is not an acceptable position. It is impossible to comment on process and data implications when they are not provided. Transparency is imperative. 3. We request a re-evaluation of the SRA areas adjacent to our project site area given the nature of the fuels adjacent to it (specifically the Regional Park). Revisions to the Future Map Processes A. As areas continues to develop over the next 20+ years, the need will certainly arise for periodic revisions to CAL FIRE's published fire hazard severity maps in order to account for changes in land use and to reconcile CAL FIRE's maps to actual development conditions within the project area. Notably, the Irvine Company anticipates that its development activities will be substantial

following CAL FIRE's adoption of its current fire hazard severity zone map update and the time that CAL FIRE prepares and adopts its next map update (i.e., five (5) years or more). Based upon Irvine Company's projections, CAL FIRE's current map update will soon become outdated due to mass grading of the site. To that end, we respectfully request that CAL FIRE establish a program I protocol for receiving, reviewing and processing changes to CAL FIRE's maps that are appropriate and necessary for the periods between CAL FIRE's regular map update cycles. In the absence of an intra-cycle map revision process, the risk exists for mischaracterization of lands and the creation/ perpetuation of problems which are attendant to such misidentifications (e.g., the inability to obtain fire insurance coverage for lands located with the high or very high fire hazard severity zones). Dave Prolo President Irvine Company Community Development.

Response: CAL FIRE reviewed the zoning and underlying data in this area and determined that hazard was appropriately classified based on the vegetation composition and burn probability. While vegetation currently is affected by the 2017 fire, this area and the wildland to the NE is modeled to return to chaparral/scrub. The weather data used isn't just the very rare once in 100 years events. It amounts to the worst 10% of days (so 36.5 days per year on average) and then on those days the most severe 5% of hours, which comes out to an average of 44 hours per year. Over a 100 year period these conditions would be expected to occur for 4400 hours total, across 3650 days.

ID 2225, Comment: April 3, 2023 Office of the State Fire Marshall California Department of Forestry and Fire Protection FHSZ Comments via email at fhszcomments@fire.ca.gov To whom it may concern: As a property owner and developer in east Otay I'm writing to express my concern regarding the increased fire zone designation being contemplated for the area. Kearny Real Estate Company has been a part of the growth in Otay Mesa since the early 2000's. Previous projects included Siempre Viva Industrial Park and Britannia Park Place. Beginning in 2007, we embarked on land entitlements in east Otay for what is now the Otay Crossing Commerce Park (see attached Exhibit A) which since 2000 is one of the largest master planes business parks in all of San Diego County. Through various phases, improved lots and infrastructures have been developed on what was green fields from Enrico Fermi Road to the west to Paseo De La Fuente (previously Lonestar road) to the east. In addition to the development, the County of San Diego is currently building a state-of-the-art fire station at the corner of Otay Mesa Road and Alta Road which will provide direct services to the designated area. Both of these have and will have a positive impact in reducing the fire hazard exposure in east Otay. As a part of our overall Otay Crossings development, the lot subdivision now includes a number of storage yards which have very low exposure to fire hazard and provide no combustible building materials along with buildings that have been designed and provide features which reduce exposure to fire hazards. As an example, all buildings are constructed with upgraded fire-resistant sky lights which are now required standard as a part of the building code. Given the demand for this type of space in the County, Otay Crossings will not be the end of the road as to further development in the area. There are projects slated to be built on the all the adjacent parcels to Otay Crossings as well as to the east. This will include the 100+ acre Otay Port of Entry #2 which is slated to open in 2024-2025. A changing of the map to a higher rated fire zone for the area will have a detrimental impact on future development and could limit additional locations for businesses in San Diego County to operate. We would argue that with current and past development, fire protective building codes and the on-lining of the new fire station there are sufficient supports to maintain the current Fire Map designation and we kindly

ask that you re-consider the proposed map update. Sincerely, Jeff Givens Partner - Kearny Real Estate Company

Response: CAL FIRE reviewed the zoning and underlying data in this area. FHSZ was adjusted in one wildland polygon to improve consistency in hazard mapping across similar fuels and fire likelihood. In addition, the non-wildland extent was adjusted to account for the development, where not already accurately captured.

ID 720, Comment: Hello, The zones in Solano County are extreme changes. The fire conditions in the Rockville area and specifically in Rockville Heights do not warrant these changes. Much of the area placed into more severe zones is grassland that is grazed. The fuel models do not support the upgrade in severity zones. Specifically I am speaking of Rockville Heights, parts of Rockville Road, Rockville Park, Oakwood Drive, parts of Suisun Valley Road and Stonefield Lane. These areas do not have any history of significant fires. The upgrade in zones is not supported. One extreme example is the zones have been changed to put a flat green, irrigated cemetery into a high zone. This makes no sense. These zones have been created haphazardly. Aaron McAlister

Response: FHSZ in this area gets buffered in from an adjacent wildland polygon, which is very large and had a hazard score highly influenced by the higher hazard in the south part of the polygon. CAL FIRE edited this polygon and reclassified the northern side, which is dominated by lighter fuels, from Very High to High. FRA designations will not be part of the official regulation; however, CAL FIRE reviewed FRA lands within this polygon to ensure consistent mapping.

ID 811: Comment: Hello, Please see our attached comments on the proposed Fire Hazard Safety Severity Zone map. I have attached a Powerpoint file with comments on the first tab accompanied by slides with maps referenced in the comments. The bottom line is we believe unburned vineyard land, particularly that which served as a firebreak during the Glass Fire, should not be coded "red" indicating Very High risk. The majority of our comments address property at Sonoma county APN 028-260-052 and Napa county APN 020-300-051. The fire hazard severity zone delineation appears to be based on recent wildfires The forest which burned during the Glass Fire is coded orange meaning High risk whereas areas not burned are coded red meaning Very High risk The majority of the Pride Mountain Vineyards property (which did not burn during the Glass Fire) is vineyard property, a proven firebreak during wildfires. Much of this vineyard property is coded as red in the proposed Fire Hazard Severity Zone map We believe our vineyard property should be coded yellow (or at worst, orange) as the risk of fire hazard is very low in vineyards as proven by how the Glass Fire was stopped on all sides of our vineyards We have included an aerial map of our property roughly at the same scale as the enclosed proposed Fire Hazard Severity Zone map screen capture We have noted the vineyard land we believe should be reassessed as yellow, especially the larger portion on the left/west side of the map A final slide shows the location of our property on a larger map We would appreciate your feedback on our thoughts Physical address is 3000 Summit Trail, Santa Rosa, CA 95404 Please let us know what you think or if you have any questions. Regards, Rob Morris Chief Financial Officer rmorris@pridewines.com 707 963 6064 x105

Response: No changes were made to the regulation in response to this comment. Recent wildfires have resulted in damage and structure loss to within agricultural areas. The main mechanism of hazard in these areas is ember transport from adjacent wildland, but many

agriculturally managed lands (vineyards, orchards, grazing, and other types), do contain modest fine fuels allowing for spread. The fire prevention regulations that go with FHSZ zoning are appropriate to mitigate fire risk in these lands where adjacent wildlands produce firebrands capable of vectoring fire into them. Recent fires (through 2020) do factor into burn probability in the model, as they reflect trends in fire likelihood within similar climate and fuel groupings. Like other temporary mitigations such as fuel treatments, the effect of wildfires on fuel loads is limited due to vegetation regrowth or type conversion. Because some of the most critical fire safety regulations involve construction materials and methods, which are influential over the entire life of a structure, FHSZ utilizes fuel conditions that reflect the maximal hazard condition likely to occur over a 30-50 year time horizon.

ID 759, Comment: Hello, I am writing about the fire hazard zone map and want to draw your attention to Willow Creek Park. From my understanding this park still does not have a ranger patrol and we have had fires in the park before. Added to the lack of oversight is there is a growing fuel load with the sudden oak death taking out a large portion of oaks. While the severity zone for that area is moderate to high I dont think that's a correct analysis because it's very difficult to get back there to look at it. I have reached out to a number of people in different agencies for help with management of the fuel load offering community coordination and access from my property that shares a property line with the park. Several years ago I walked the property line partway between Willow Creek and Colman Valley with a group for Parks and RCD and it was impossible to walk it because there were so many downed trees. I urged the SC Parks office to apply for a calfire grant to clear the fuel loads and was told several times (over the past 5 years) that there was a clear upcoming plan for management of Willow Creek park and I still have not heard what that plan is. A fuel break on or near the ridge between Willow Creek and Colman Valley would make 100's of homes inland from that ridge safer. Thanks, Eurydice Rorick Mountain Wolf Ranch

Response: No changes were made to the regulation in response to this comment. Regarding the area of former Concord Naval Weapons Station- a large portion has been transferred from the Navy to East Bay Regional Parks. This takes the land out of FRA and puts it in SRA or LRA. This land should have corresponding FHSZ's attached to them. Additionally, in the next 24-36 months it is anticipated additional transfers will take place from FRA to LRA. This land should be pre-zoned for FHSZ purposes.

ID 1406, Comment: The Ewiiapaayp Band of Kumeyaay Indians (EBKI) has reviewed the draft Fire Hazard Severity Zones (FHSZ) Map. The FHSZ depicts a "Very High" SRA for the Ewiiapaayp Indian Reservation that appears to be about 20 acres in area. Please see attached screenshot of the FHSZ map with the Ewiiapaayp Indian Reservation in the center and the FHSZ SRA with a marker placed at Longitude-116.3789, Latitude32.8361. The Ewiiapaayp Indian Reservation is 5,460.13 acres in total in this area. EBKI is concerned that only about 20 acres are marked for Fire Hazard Severity Zone Very High, while the remaining 5,440.13 acres are not Very High, High, or even Moderate Fire Hazard Severity Zone. Please note the fee properties in Thunder Valley contiguous to the southwest boundary of the Reservation (Thunder Valley LLC, Thunder Valley LL1, Filippone & Christina Salvatore, Nodzak Survivors Living Trust, Joint Estate of William Curran, etc.), and the Thing Valley Ranch properties (7 Time Properties LLC) contiguous to the south boundary of the Reservation, are depicted with a Fire Hazard Severity of Very High for all of these fee properties. EBKI cannot apprehend the

rationale for designating as a Very High Fire Severity Zone only 0.0036% of the Ewiiapaayp Indian Reservation while designating 100% of contiguous fee properties as Very High Fire Severity Zone. Please record EBKI's objection to the designation of such a small area of the Reservation as a Fire Hazard Severity Zone of Very High. We request an explanation and a remedy for this question. Thank you. Will Micklin, CEO Ewiiapaayp Band of Kumeyaay Indians 4054 Willows Rd Alpine, CA 91901-1620 Email: ceo@ebki-nsn.gov Tel: (619) 368-4382

Response: No changes were made to the regulation in response to this comment. The area not shown as VH is in FRA where FHSZ are not required. If zoning were required on the rest of the reservation, it would also fall in the Very High hazard class according to the statewide FHSZ model.

ID 432, Comment: I have reviewed your criteria for assessment of Hazard for Fire Zone in my home. The criteria are understandable as well as generally beyond my capacity to offer a detailed counter argument for my property to be assessed as Very High Fire Hazard Zones. Aside from being located on the edge of a ridge, as opposed to a more downward slope like my neighbors who are assessed as High Risk, this assessment seems to not account for the fire behavior of the Nunn's fire in 2017. In our neighborhood area, having lived in Bennett Valley since 1997, and our current home on Bennett Ridge since 2006, our higher risk fire times with winds are in the fall and generally off-shore direction, such as the very high winds of the Nunn's fire. Our prevailing winds from the west/south west are on shore from the ocean, and are cooler and contain more humidity, especially fog. During the Nunn's Fire, the highest density of homes that survived the Nunn's Fire were along our section of the Ridge, where 4 homes in a row along the Ridge Line gratefully survived despite extreme fire conditions of high dry winds, flying embers with high winds (we evacuated with the fire within 100 + yards of our property) and no Fire fighting activity occurring at that time. Fire blocked our exit to the east. One of those High hazard (versus Very High Hazard) properties homes that did not burn is 75 yards from our home, and where the others similarly close are rated Very High. Most of the other homes within ¼ mile rated as High Hazard were burned in the Nunn's fire and are now gratefully rebuilt. One factor not seen in this assessment is the density trees (less in our section) and more defensible space, as well as the large Vineyard property bordering these properties to the west. Vineyards did burn, but not similar to grass or trees. Despite being on the ridge edge with possible exposure to slope risks and wind did not appear to play as significant of a role in the most significant fire during the period of 30 years noted in your assessment. My main concern, addressed in your information, is that despite the reassurances provided the Hazard assessment will effect Insurance as well as home values. Our neighbors do what is within their power to reduce risk, mitigations such as removing brush and trimming weeds, limbing up trees, having hardscapes. My hope is that our situation would be reconsidered as an exception to the designation of Very High Hazard Risk. Thank you. Respectfully, John F Mackey 2540 Bennett Ridge Road Santa Rosa, CA 95404 Sent from Mail for Windows

Response: No changes were made to the regulation in response to this comment. The climate data does include the coastal influence, resulting in reduced estimates of fire intensity in this area. Recent fires (through 2020) do factor into burn probability in the model, as they reflect trends in fire likelihood within similar climate and fuel groupings. Like other temporary mitigations such as fuel treatments, the effect of wildfires on fuel loads is limited due to vegetation regrowth or type conversion. Because some of the most critical fire safety regulations involve construction materials and methods, which are influential over the entire life of a

structure, FHSZ utilizes fuel conditions that reflect the maximal hazard condition likely to occur over a 30-50 year time horizon. Recent wildfires have resulted in damage and structure loss to within agricultural areas. The main mechanism of hazard in these areas is ember transport from adjacent wildland, but many agriculturally managed lands (vineyards, orchards, grazing, and other types), do contain modest fine fuels allowing for spread. The fire prevention regulations that go with FHSZ zoning are appropriate to mitigate fire risk in these lands where adjacent wildlands produce firebrands capable of vectoring fire into them.

ID 936, Comment: January 31, 2023 CALIFORNIA DEPARTMENT OF FORESTRY Office of the State Fire Marshal Attn: FHSZ Comments DELIVERIED VIA EMAIL Dear Gentlepersons, We commend the department of Forestry for their efforts to update the FHSZ maps in State Responsibility Area. As a fire district which encompasses portions of both SRA, LRA, and FRA, we are providing comments based on the proposed ratings in our area. Specific Comments: 1) The area in and around the Fall River Golf Course, is shown as “Very High”. This seems unreasonably high, as this is a moderate density residential development, which is surrounded by irrigated golf course. FIGURE 1 2) The area of Fall River Mills, south of Bridge St is also shown as “Very High”. This seems unreasonably high, as this is a moderate density residential area and many of the buildings in this area are physically located on the Fall River, and associated riparian vegetation. FIGURE 2 3) Between McArthur and Fall River Mills, east and south of Dee Knoch Road; some areas are shown in all three severity categories. In the case of the cluster of homes around the Dee Knoch, Jim Day intersection, the assignment of “Very High” seems unreasonable, as the area is surrounded by irrigated fields on three sides, and fairly light fuels to the south/southeast. Perhaps more striking, there are irrigated fields which are classified as “Very High” and “High” to the east of this area. In general, the classification of those irrigated fields as SRA seems to be an error, and they should be considered for inclusion with the adjacent LRA. FIGURES 3 and 4 4) At the Pittville Road and Old Hwy Road Intersection, irrigated fields located in LRA meet SRA lands classified as “Very High”. It would seem appropriate to have a more stepped transition here, perhaps including some moderate and/or high severity ratings adjacent to the irrigated fields, instead of an abrupt transition to “Very High”. FIGURE 5 5) On Big Lake, the lake surface itself is show as SRA, with three different fire severity categories. This seems to be a misclassification of SRA, as it is a lake with zero probability of burning, but it is perhaps equally perplexing that it would have three different severity ratings. Some of this could possibly be explained by portions of the lake being State owned, but that would not explain the three different ratings, as well as the classification of the non-state owned portions of the lake as SRA. FIGURE 6 General Comments: 1) It appears that several of the anomalies/discrepancies are due to misclassification of SRA lands (which may have been developed from wildlands to irrigated lands since their initial classification). 2) The abrupt transition from presumably low to moderate fire severity LRA lands (some of which are irrigated fields) directly to very high severity SRA lands seems unreasonable; we believe a transition first to “moderate” and/or “high” first would be more appropriate in almost all cases. Thank you again for the opportunity to comment on this issue, and for working to update these maps. If you have any questions, please contact me via email at chief16@mcarthurfire.org. Sincerely, Fall River Valley FPD Jeffrey J. Oldson Fire Chief

Response: No changes were made to the regulation in response to this comment. The Fall River Golf Course and nearby low-density residential areas are fairly continuous with the surrounding wildland fuels and therefore receive the same FHSZ designation as the surrounding wildland.

The different zones in Big Lake and the High and Very High hazard zones in irrigated fields in this area are due to the methods used to zone non-wildland. Agricultural areas and water bodies are zoned using a buffer routine that is based on the hazard originating in the adjacent wildland, with higher hazard closer to the wildland. These methods were used to account for potential threat of embers to buildings in agricultural areas, on docks and house boats, as well as variation in reservoir height that occurs with drought. The LRA areas adjacent to SRA don't represent an abrupt change in hazard class, but rather the boundary between SRA and LRA. LRA will be zoned into FHSZ, but the hazard classification in LRA is not included in the current regulation for SRA (i.e., LRA areas are not shown on maps/viewer during the SRA public comment process). We will be addressing any localized consistency and accuracy issues of the Fall River Mills LRA area during local review, which will allow for comments and suggestions for map changes.

ID 557, Comment: Dear Cal Fire: I object to my 5-acre parcel at 4953 Sonoma Mountain Road, Santa Rosa, being reclassified to the Very High Hazard Severity Zone. I acknowledge that this assessment does not consider fuel mitigation efforts or home hardening. The designation for 4953 Sonoma Mountain Road seems arbitrary. I am bordered on three sides by properties designated to be Moderate Hazard Severity Zone. Some of those moderate areas burned during the 2017 fires while my property did not. Much of my property is open fields/grasslands, precisely the nearby habitat that you deem to be moderate. The remainder of my property is oak trees, mostly coast live oak and Oregon white oak. Your model fails to differentiate between oaks and conifers. I have a masters in biology from Humboldt State University and am very familiar with the characteristics of these trees. Oaks are MUCH LESS COMBUSTIBLE than conifers and present far less risk. This may be an overall modelling issue, but it affects my parcel greatly. A strip of nearby property along the South Fork of Matanzas Creek is designated to be Very High Hazard Severity Zone. This makes little sense because that area remains relatively wet even during the hottest times of the year, and the trees adjacent to the stream are very unlikely to burn. I suspect that including the strip of land along the South Fork of Matanzas Creek is a major factor in the erroneous classification of my parcel. Excluding the South Fork of Matanzas Creek, the area including my property would likely be an "island" under 200 acres and ineligible to be included in a Very High Hazard Severity Zone under your criteria. Please revise the classification of my property and those of my immediate neighbors from Very High Hazard Severity Zone to High Hazard Severity Zone or Moderate Hazard Severity Zone. Thank you. Craig S. Harrison
4953 Sonoma Mountain Road Santa Rosa, CA 95404 707-573-9990 <https://www.craigsharrison.net/>

Response: No changes were made to the regulation in response to this comment. The FHSZ model does differentiate between oaks and conifers, but the conifer dominated areas in the vicinity are too small to be their own polygon and therefore get included along with the predominant Montane Hardwood and grassland in this polygon and contributed to the overall higher score. CAL FIRE adjusted FHSZ in this area to account for the surrounding low burn probability and moderate hazard.

ID 556, Comment: Memo to: Cal Fire at FHSZcomments@fire.ca.gov. From: David Poe Treasurer of HOA and Homeowner with Mary Poe Subject: Fire Hazard Severity Zone Map Date: January (xx), 2023 As homeowners at 5100 Burnham Ranch Road, Santa Rosa, CA 95404, we are concerned about your proposed Fire Hazard Severity Zone Map where you are proposing

that our address and the entire 320 acres of Summit View Ranch be included in the Very High Hazard Severity Zone (Red). The reason for our concern is that this change could negatively impact many aspects of our home ownership including property valuation, ability to sell our property, and cost of property insurance. We understand that your maps evaluate “Hazards” based upon the physical conditions that create the likelihood of fire behavior over a 30-50 year period, which you have summarized as the “likelihood of a damaging event”. Please let us summarize why we think that the Hazards related to our property do not justify such a high assessment of severity. This will be followed by questions that we have for you to help us better understand your assessment methodology and preliminary conclusions: Hazard factors related to my residence and its surroundings: 1. We are part of a homeowners association (Summit View Ranch HOA) which represents 21 homeowners on a 320-acre parcel (the Ranch, which continues to run cattle, was developed into 21 homeowner sites in 1979). Collectively, we manage these 320 acres to reduce hazards, with a goal of making the entire 320 acres defensible space. We do so by having regular work parties whose activities include cutting flammable trees (e.g., Bay Laurel trees), eliminating flammable bushes (e.g., blackberry bushes), and limbing up trees on the ranch (mostly indigenous Live Oak trees). In 2010, we initiated a relationship with Carleone Safford, then Coordinator of Fire Safe Sonoma, and have taken advantage of their Chipping Program every year since. 2. The Ranch has been a cattle ranch for at least 100 years, and we run about 60-80 head of cattle on the ranch every winter and spring to keep grasses low. 3. The Ranch is bordered by other ranches, principally the Cook Ranch and the Jacobs Ranch (which is now the North Sonoma Mountain Regional Park). These ranches are also principally open grazing areas. 4. Summit View Ranch benefits from frequent fog layers coming up from the Petaluma Gap to our west (the prevailing wind pattern). We find that this keeps our humidity level relatively high compared with other parts of the County. Humidity and other weather historical information can be found at <https://www.wunderground.com/dashboard/pws/KCASANTA2740/table/2022-08-18/2022-08-18/monthly> 5. We have relatively easy and open access for fire suppression including having 6 fire hydrants (mapped and tested/maintained annually), having 2 miles of paved roads with easy access/ turnaround by fire trucks, and having multiple egress routes in case of an emergency. We also maintain an extensive water system which now includes an 80,000 gallon storage capacity accessible by local fire departments. We are also only 2 miles from Fire Station # 8. The consequence of the above Hazard factors is that we have never, in the last 100 plus years and as far back as anyone can remember, suffered any damage from the wildfires that have occurred in our region. There are family members living on our Ranch today that were part of the original family that purchased the land as a cattle ranch over 100 years ago that can attest to this fact. Please note that your map shows us as a very small “finger” or “peninsula” of red, surrounded on three sides by less severe ratings and can easily be converted to moderate! We also invite and urge you to visit our property to add your personal perspective to your decision-making on the proposed map. Having now summarized the hazards related to my property and our surroundings, here are our questions that we wish to propose to your organization: 1. Are the Hazard factors described above ones that you use in your modeling and data input efforts to determine an area’s severity zone? 2. If not, could you describe what other factors that you use that we have not addressed above? 3. Will you please explain and forward to us the data on weather patterns, humidity, wind, specific vegetation and fire history that was used to place our 320-acre ranch in the extreme fire hazard range? 4. What additional information would you like to receive from us to better help you understand our hazard factors that lead to your assessment

of our severity factor? We appreciate your holding public hearings on this subject (which we personally participated in) and in your commitment to responding to our questions. Please see attached letter as our homeowner response to your Fire Hazard Severity Zone Map. Thank you for considering our input. David and Mary Poe David Poe 707-529-5842 davidpoeus@gmail.com

Response: The FHSZ model does not account for fuel reduction efforts or fire suppression resources. The climate data does include the coastal influence, resulting in reduced estimates of fire intensity in this area. The very high hazard rating in this zone is a result of much of the vegetation (particularly to the N and E of the ranch) being classified as Montane Hardwood, and most of the area having a steep slope. Due to the surrounding low burn probability and the surrounding moderate hazard in the area CAL FIRE reclassified FHSZ to High.

ID 1149, Comment: State Fire Hazard Severity Zones Please consider the following comments regarding the proposed rulemaking concerning the regulations relating to fire hazard severity zones in the State Responsibility Area. After reviewing the map entitled “State Responsibility Area Fire Hazard Severity Zones” for the Plumas County region a few areas caught my attention. 1) Mohawk Valley – The area encompasses the communities of Plumas Eureka, Mohawk, Blairsden, and Graeagle. The map shows a large area of “High” hazard zone that is fairly intricately cut out of the surrounding “Very High” zone. However, this seemingly intricate boundary does not correlate to any apparent change in actual, on-the-ground conditions that would influence fire hazard. The charming communities of Plumas Eureka and Graeagle are built right into a landscape dominated by long-needle pine dominated mixed conifer forest. During the Dixie and North Complex wildfires of 2021 and 2020 fire swept from wildlands through communities that were delineated by much more dramatic vegetation/fuel changes than in these communities. Elsewhere on this map, where no apparent vegetation type change exists between wildland and developed community there is no change in fire hazard severity rating. I believe that the forested areas in the Mohawk Valley should be included in the “Very High” hazard zone and the “High zones should be limited to the meadow areas only, as they are elsewhere on the map. (It is also odd that the large contiguous meadow system that is now Graeagle Meadows Golf Course is included in the “Very High” zone. It is likely “Moderate” if not fireproof). 2) The Eastern Escarpment – The area encompasses the landscape east of the hydrologic crest of the Sierra Nevada mountains down to the valley floors through which Highway 395 runs and includes the communities of Janesville, Milford, Doyle, Constantia, and Long Valley. The map shows a change in hazard zone from “very High” to “High” and “Moderate” in a couple of places that appears closely associated with the change in vegetation type from conifer forest to sage and grassland. However, this change in hazard zones does not appear to consider the historic fire behavior that occurs in this area caused by local weather phenomena that is well documented (including in a California Department Of Forestry training video that documents the horrifying events of the 1989 Eagle Fire burnover). The 2021 Beckwourth Complex also served as a vivid reminder of the expected fire behavior associated with local weather phenomena that generate rapid, high intensity down-slope fire runs with overwhelming spotting and violent vortices. The predictability of these conditions is high enough that this area should be considered a “very high” hazard zone from the Sierra Crest east, down to Highway 395 in most cases. There are other smaller areas of inconsistency such as a small portion of forested land on the western edge of Indian Valley, South of Greenville that is shown as “High” but probably should be “Very

High”. Thank you for the opportunity to comment. Ryan Bauer 755 Jackson St. Quincy, CA 95971 rb13a@yahoo.com (530) 394-8007

Response: No changes were made to the regulation in response to this comment. This zone was distinguished from the surrounding forested area because the slope is less than 20%. In addition, the vegetation used in the model differs: within the polygon is Eastside Pine, and outside is Sierran Mixed Conifer, which get assigned a moderate and very high fuel load, respectively. The golf course, along with the neighborhood to the SW are an urban polygon scored by buffer. While the golf course is unlikely to burn in its current state, if it were to be developed for residential use the houses should be built to a standard that accounts for the hazard from the adjacent Very High wildland. CAL FIRE reviewed the zoning and underlying data in this area and determined that hazard was appropriately classified based on the vegetation composition, slope, and burn probability. During zone formation this area was included along with the valley, and therefore gets a lower hazard when averaged over the entire zone.

ID 3449, Comment: DWIGHT CERESOLA, DISTRICT 1 KEVIN GOSS, DISTRICT 2 SHARON THRALL, DISTRICT 3 GREG HAGWOOD, DISTRICT 4 JEFF ENGEL, DISTRICT 5 Office of the State Fire Marshall California Department of Forestry and Fire Protection P.O. Box 944246 Sacramento, CA 94244-2460 Attn: Scott Witt, Deputy Chief Submitted via email: fhzcomments@fire.ca.gov PLUMAS COUNTY COMMENTS NOTICE OF PROPOSED RULEMAKING ACTION REGULATORY ADOPTION PROCESS OF STATE RESPONSIBILITY AREA FIRE HAZARD SEVERITY ZONES MAP Dear Office of the State Fire Marshall: The Plumas County Board of Supervisors recognizes the Office of the State Fire Marshal (OSFM) published a Notice of Proposed Rulemaking on December 16, 2022, concerning the regulations relating to Fire Hazard Severity Zones (FHSZ) in the State Responsibility Area (SRA). California Public Resources Code (PRC) Section 4204 requires the SFM to periodically review and revise the FHSZ designations and ratings in the SRA. As shown on the FHSZ map, all of the SRA lands are within a FHSZ classification rated as either Moderate, High, or Very High. The FHSZ map was last updated in 2007. Plumas understands the FHSZ map is being updated at this time to more accurately reflect the zones in California that are susceptible to wildfire to help provide transparency for planning and preparedness efforts and to provide communities a forecasting tool so that the public can take steps to prevent and prepare for wildfire. Moreover, in determining hazard ratings, the hazard mapping process incorporates improved fire science, local climate data, and fire assessment modeling and mapping techniques to identify the most effective measures for fire prevention, intensity, and spread. OSFM states there is substantial evidence that the current FHSZ classifications must be updated to effectuate the purpose of PRC Sections 4201 and 4202. The Plumas County Board of Supervisors acknowledges the FHSZ map is intended to visually illustrate fire hazard using a science-based and field-tested model to assign a hazard score based on the factors identified as major causes of wildfire spread. These factors are combined into the term "hazard" to refer to the physical conditions that influence and create fire likelihood and fire behavior. Overall, the updated statewide FHSZ map shows increased fire hazard, reflecting an increase in wildfire occurrence and severity in California since 2007. Specific to Plumas, the proposed FHSZ map updated November 21, 2022 (enclosed) reflects the following differences compared to 2007: The Plumas County Board of Supervisors appreciates the opportunity to respond to the Notice of Proposed Rulemaking and submits the following comments for the record: 1. Plumas County Public Hearing Pursuant to PRC Section 4203 was Disappointing. The OSFM is required to transmit the

proposed updated FHSZ map and regulations to each impacted county in California and hold a public hearing. On January 17, 2023, the CAL FIRE Lassen-Modoc Unit hosted the Plumas County public hearing in Quincy at the Fairgrounds on the proposed FHSZ map. Plumas was encouraged by the turnout with over 50 members of the public in attendance and several provided public comment for the record. Plumas was disappointed with the format being a generic written statement read out loud, in addition to the video that was shown, as it was very difficult to follow due to the speed at which the speaker spoke. While Plumas realizes the requirement to provide the same information to all counties across the state, the approach in which the information was presented could be improved to be more understandable and Plumas-specific information should have been included.

2. Lack of State and Local Government Communication, Collaboration, and Cooperation is Frustrating. Imperative to the specific Plumas County SRA FHSZ map update process is state and local government communication, collaboration, and cooperation. Plumas County is likely not the only county in California that is frustrated that locals were not made a part of the drafting and development of the SRA FHSZ map update. Plumas staff would have been very willing, especially with the County's in-house Geographic Information Systems (GIS) and planning expertise, to collaborate with CAL FIRE in local government data gathering and ground-truthing. Plumas is aware that the CAL FIRE Lassen-Modoc Unit was consulted during the map update process; however, Plumas County was not given the same opportunity.

3. Availability of Geospatial Data Files Critical for Transparency. Plumas questions why the geospatial data files to develop the FHSZ map are currently not available during the adoption process. Open access to data is critical to ensuring the accuracy of the information. The Frequently Asked Questions released by CAL FIRE states the release of the geospatial data files could compromise the integrity of the files, causing misrepresentation of the map and regulation. However, upon completion of this process, and once the FHSZ maps become formally adopted, the geospatial data files will become available to the public. Plumas continues to question why after the fact, and not during the process.

4. Recent Fire History Not Included Yet Essential for Plumas. CAL FIRE states they've used the best available science and data to develop and field test a model that served as the basis of fire hazard severity zone assignments. Continuing, it's stated the latest technologies will be used in the mapping and will include new factors now available including land use changes, recent fire history, new significant wind event data, as well as a model that is more spatially detailed. Plumas understands, specifically, that the fire history data included in the model is CAL FIRE FRAP 2020 fire history, which does not include the 2021 wildfires, those being the most significant and pervasive in generations. Statewide, a total of 2,569,386 acres burned in 2021 in nearly every corner and county in California. Plumas, Butte, Shasta, Lassen, and Tehama experienced the Dixie Fire, the largest single wildfire in California's history, affecting nearly 1 million acres. In Plumas County, the Dixie Fire destroyed homes, businesses, and left a scar on the environment. Plumas County cannot stress enough that the 2021 wildfires recent fire history must be included in the model to account for the existing conditions and lack of vegetation cover for much of Plumas, thereby likely changing the outputs when it comes to the fire hazard severity zone assignments.

5. Insurance Issues. For those in Plumas County affected by the 2021 wildfires, many could not afford insurance, were underinsured, or had their insurance canceled due to the effects on the insurance industry from the 2020 North Complex wildfires. It is devastating that families in Plumas County continue to have their homeowners insurance canceled, making it even more of a financial burden to rebuild and afford to live in the Plumas. As part of the FHSZ map update process, CAL FIRE explains insurance companies use risk

models, which differ from hazard models, because they consider the susceptibility of a structure to damage from fire and other short-term factors that are not included in hazard modeling. CAL FIRE goes on to state it is unlikely that insurance risk models specifically call out the Fire Hazard Severity Zones as a factor, but much of the same data that is used in the fire hazard severity zone model are likely included in the insurance companies' risk models. Plumas is skeptical that insurance companies won't be looking to the updated FHSZ map as a tool in evaluating and underwriting fire insurance, which will likely affect Plumas County residents' ability to obtain and/or maintain insurance. Plumas highly encourages CAL FIRE to work with Ricardo Lara, State Insurance Commissioner, to bring relief to the insurance market.

6. Minimum Wildland Zone Size Needs Re-Evaluating. CAL FIRE states the data used to determine hazard, including both fire behavior and burn probability, are averaged over a minimum zone size of 20 acres in urbanized areas and 200 acres in non-urbanized wildland areas, and the classification of a wildland zone as Moderate, High, or Very High fire hazard is based on the average hazard across the area included in the zone. Plumas suggests CAL FIRE re-evaluate the minimum size for a wildland zone, where 200 acres is too large of an area. A smaller scale would be better suited to capture varied wildland fire hazard conditions.

7. Update FHSZ Map More Often. As stated in the Frequently Asked Questions provided by CAL FIRE, the Fire Hazard Severity Zone map evaluates "hazard," not "risk." The map is like flood zone maps, where lands are described in terms of the probability level of a particular area being inundated by floodwaters, and not specifically prescriptive of impacts. "Hazard" is based on the physical conditions that create a likelihood and expected fire behavior over a 30 to 50-year period without considering mitigation measures such as home hardening, recent wildfire, or fuel reduction efforts. "Risk" is the potential damage a fire can do to the area under existing conditions, accounting for any modifications such as fuel reduction projects, defensible space, and ignition resistant building construction. With the dynamic fire environment and science in California, Plumas does not believe it's appropriate to utilize an expected fire behavior over a 30 to 50-year period without considering mitigation measures such as home hardening, recent wildfire, or fuel reduction efforts. Much shorter time periods must be established to analyze, review, and revise the FHSZ map. Wildfire impacts, fuel reduction efforts, and home hardening mitigation will impact future fire behavior and should be accounted for in closer to a 10 year timeframe.

8. AB 38 Real Estate Disclosure Defensible Space Inspections Create Additional Regulatory Burdens. Statutory mandates require that all property in High or Very High FHSZs comply with Civil Code 1102.6f, real estate disclosures Assembly Bill 38 (Wood, Chapter 391, Statutes of 2019). These disclosures are known as "AB 38 Defensible Space Inspections," and are not required for property in Moderate FHSZs. As a result of the proposed regulations, the boundaries of Moderate FHSZs shifted for some Plumas County parcels, altering which properties are now required to comply with AB 38. With a change in parcel zone designations from Moderate to High or Very High, Plumas knows the expansion and reclassification of those FHSZ mapped areas will cause additional burden and regulatory requirements under the AB 38 real estate disclosures. In Closing As stated, the broad objective of the proposed rulemaking is to ensure that the people of California understand the degree of severity of fire hazard that is expected to prevail in the zone in which they live and can identify and implement the measures that will reduce the potential for losses to life, property, and resources from wildfire. The anticipated benefit will enhance public safety and protect California's vital natural resources and wildlife. Plumas County urges the Office of the State Fire Marshall to genuinely consider the comments of Plumas, other affected counties, and the public and take the time to modify the

model in the FHSZ map update and rulemaking process to better achieve the objectives and public safety benefits. Lastly, Plumas highly encourages CAL FIRE to prioritize grant funding specific to the SRA High and Very High FHSZ areas to further enhance public health and safety and to protect and restore the environment. Please direct all correspondence to Planning Director, Tracey Ferguson, AICP, at traceyferguson@countyofplumas.com or (530) 283-6214. Thank you for your consideration of Plumas County's comments. Sincerely, Plumas County Board of Supervisors

Response: No changes were made to the regulation in response to this comment. We calculated burn probability early in the modeling process and 2020 was the most recent year available at that time. If the Dixie Fire were included in the model, it would impact burn probability, but not fire behavior estimates. Like other temporary mitigations such as fuel treatments, the effect of wildfires on fuel loads is limited due to vegetation regrowth or type conversion. Because some of the most critical fire safety regulations involve construction materials and methods, which are influential over the entire life of a structure, FHSZ utilizes fuel conditions that reflect the maximal hazard condition likely to occur over a 30–50-year time horizon.

ID 2649, Comment: March 28, 2023 Office of the State Fire Marshal California Department of Forestry and Fire Protection P.O. Box 944246 Sacramento, CA 94244-246 Attn: Scott Witt, Deputy Chief c/o Daniel Berlant, Acting State Fire Marshal RE WESTRIDGE VALENCIA MASTER HOMEOWNERS ASSOCIATION Public Comment Submission Petition for Repeal of Proposed Regulations. California Code of Regulations TITLE 14. Natural Resources DIVISION 1.5. Department of Forestry and Fire Protection CHAPTER 7. Fire Protection SUBCHAPTER 3. Fire Hazard ARTICLE 1. Fire Hazard Severity SECTION 1280.01. Fire Hazard Severity Zones in the SR. TITLE 19. Public Safety DIVISIO?? 1. State Fire Marshal CHAPTER 17. Fire Hazard Severity Zones, 2 Dear Mr. Witt: This firm serves as general legal counsel to Westridge Valencia Master Homeowners Association ("Association"). Please direct any correspondence to the undersigned at our Woodland Hills office. On behalf of the Association, our office would like to object to the proposed State Responsibility Area ("SRA") Fire Hazard Severity Zone ("FHSZ") drafted for Valencia, CA. This letter shall also constitute the Association's petition under California Government Code section 11340.6 requesting the Office of the State Fire Marshal repeal the proposed State Responsibility Area ("SRA") for the Fire Hazard Severity Zone ("FHSZ") for Valencia, CA and to eliminate the Association's community from being included in the proposed SRA. Specifically, the proposed FHSZ encompass the entirety of the properties located within the Association. The Association believes the State Fire Marshal's proposed SRA for the FHSZ in Valencia is overbroad and unduly burdensome to the Association and its property owners. If allowed to be adopted, the homeowners and the Association itself will be subject to unnecessary expenses that will desecrate mature, healthy landscaping. Moreover, the Association believes the State Fire Marshal's designation of the SRA for the FHSZ in Valencia does not take into consideration necessary factors that must be accounted for. Office of the State Fire Marshal California Department of Forestry and Fire Protection March 28, 2023 California Public Resources Code Section 4202 requires the State Fire Marshal to consider different factors when classifying SRAs for FHSZs, stating: "The State Fire Marshal shall classify lands within state responsibility areas into fire hazard severity zones. Each zone shall embrace relatively homogeneous lands and shall be based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have been identified by the department as a major cause of wildfire spread." Here,

the classification of the Association's community into the SRA FHSZ along with nearby slopes is inconsistent with the requirement such zone will "embrace relatively homogenous lands", as the Association's community has been leveled to stand out from the natural slopes nearby. The land the Association's community is built on has been extensively modified and developed to render it distinct from the natural slopes where the Fire Marshal's proposed SRA FHSZ exists. To pair the Association's community with natural conditions completely distinct and different from what the Association has built goes against the requirement the SRA FHSZs embrace relatively homogenous lands. Therefore, because the Association's land is not relatively homogenous with the land in the proposed SRA FHSZ, it should be removed from the Fire Marshal's proposed SRA FHSZ. Next, the State Fire Marshal's assessment under California Public Resources Code Section 4202 does not take into account several relevant factors that affect the Association's risk of wildfire spread. These include the following 1. All homes constructed since 2000 have been built with closed eaves. 2. All homes within Westridge have concrete tile roofing. 3. No wood fencing is allowed anywhere in the community. 4. No wood siding has been used in any of the homes. 5. A large portion of this community is surrounded by fully irrigated golf course. 6. The Association manages and irrigates a large, landscaped area that serves as a buffer to all the homeowner properties within the Association. This buffer area is professionally managed by a landscaping company, a landscaping committee, and an on-site management representative. 7. A fully irrigated and fully maintained Land Maintenance Area ("LMD") exists as a buffer between the Association's landscape buffer area and the natural slopes that is fully monitored by LA County and a directed landscape crew. All of these features included in the Association's community deter wildfire spread substantially, specifically, with the use of flame-retardant materials in construction of the homes, as well as multiple buffer zones that already exist, including the Association's fully irrigated golf course and landscape area, as well as the LA County LMD. These factors all weigh in favor of finding the Association's community remains safe from elevated wildfire risks. The multiple fully irrigated and maintained buffer zones between the Association and the natural slopes especially cuts against a finding by the State Fire Office of the State Fire Marshal California Department of Forestry and Fire Protection Marshal that sufficient fuel loading exists within the Association's property that would feed natural wildfires. Therefore, taking these factors into consideration, the State Fire Marshal must reevaluate its proposed SRA for Valencia's FHSZ. Should the State Fire Marshal's proposed SRA for FHSZ in Valencia be adopted as it currently stands, the Association and its homeowners will experience substantial hardships and expenses. Specifically, the Association's insurance policy premiums will increase significantly should its entire community be designated as a SRA in the FHSZ for Valencia. All over California, insurance premiums have increased substantially for association developments, which in part has been due to properties being designated as FHSZs. Many insurance companies are even dropping associations entirely because of adverse fire ratings. A property's fire rating entails vast and severe consequences, which makes it even more crucial for the State Fire Marshal to take all relevant factors into consideration to try and create the most accurate fire ratings possible for associations and communities. Moreover, should the current proposed SRA for FHSZ in Valencia be adopted, the Association and its homeowners will be required to conduct extensive brush clearance that will cause substantial damage to the natural landscape that has matured and endured for decades. This will directly cost the Association and its homeowners, as well as indirectly through impacts to property values and the Association's operating budget for the foreseeable future. For all these reasons, the Association protests to the State Fire Marshal's proposed SRA for the FHSZ for Valencia and requests repeal

of this proposed SRA. with the Association's property removed from any proposed SRA the State Fire Marshal adopts for Valencia, CA. The Association now submits this appeal to the Office of the State Fire Marshal as allowed by California Public Resources Code Section 4204, which states: The State Fire Marshal shall periodically review zones designated and rated pursuant to this article and, as necessary, shall revise zones or their ratings or repeal the designation of zones. Any revision of a zone or its rating or any repeal of a zone shall conform to the requirements of Section 4203. In addition, the revision or repeal of a zone may be petitioned pursuant to Sections 11340.6 and 11340. 7 of the Government Code." California Public Resources Code Section 4204 allows the Office of the State Fire Marshal to receive petitions to revise or repeal a zone pursuant to Sections 11340.6 and 11340. 7 of the Government Code. This authority is the basis of the Association's appeal to the Office of the State Fire Marshal. Therefore, the Association expects written confirmation of receipt of its appeal to repeal the State Fire Marshal's proposed SRA for the FHSZ in Valencia that includes the Association's community in the proposed SRA within thirty (30) days of receipt of this letter. Should the Association not receive a response to its petition to repeal the Office of the State Fire Marshal's proposed SRA for FHSZ in Valencia that includes the Association's community, the Association shall exercise all its available legal remedies against the Office of the State Fire Marshal. Nothing in this letter shall be construed as a waiver of the Association's rights and remedies, all of which are hereby expressly reserved. Thank you for your attention to this matter. Very truly yours, BEAUMONT TASHJIAN JEFFREY A. BEAUMONT, ESQ. JAB:km/vm cc: Board of Directors

Response: Zones are designed to be relatively homogeneous but there can be adjacent zones that are distinct areas and are scored as separate zones but get the same FHSZ designation, for example non-wildland adjacent to wildland gets a buffer of the same FHSZ class as the adjacent wildland.

Comments(s): Model Error Response

Overview: Model Error Comments

Overview: Model Error – The Office of the State Fire Marshal received 20 comments that were concerned that the model should be adjusted for climate and burn probability in or around Lucerne Valley. The comment ID's that relate to those comments are as followed below: [1419, 2007, 2058, 2166, 2194, 2203, 2204, 2285, 2286, 2289, 2290, 2294, 2300, 2304, 2333, 2337, 2346, 2365, 2374 & 2684].

Response: CAL FIRE adjusted FHSZ in this area to better match the climate and burn probability of the local area.

Overview: Model Error – The Office of the State Fire Marshal received 17 comments that were concerned that the model should be adjusted for land use and wildland fuels. The comment ID's that relate to those comments are as followed below: [(Los Angeles County: 1486, 2331, 2650, & 2651) & (San Luis Obispo County: 977, 1769, 1782, 1783, 1789, 1797, 1816, 1898, 1901, 2016, 2073, 2108, & 2295)].

Response: CAL FIRE adjusted FHSZ in these areas, where necessary to better reflect current land use and wildland fuels.

Overview: Model Error – The Office of the State Fire Marshal received 3 comments that were concerned that the model should be adjusted for similar fuels and fire likelihood. The comment ID's that relate to those comments are as followed below: [(Sonoma County: 274), (Modoc County:907) & (Contra Cost County:1711)].

Response: CAL FIRE adjusted FHSZ in these areas, where necessary to improve consistency in hazard mapping across similar fuels and fire likelihood.

Overview: Model Error – The Office of the State Fire Marshal received 7 comments that were concerned that the model should be adjusted for completed development. The comment ID's that relate to those comments are as followed below: [(San Luis Obispo County,1792 & 2344), (Los Angeles County,1880 & 2648), (Orange County,2164 & 2656) & (San Diego County, 2284) ,].

Response: CAL FIRE reviewed the zoning and underlying data in these areas, where necessary. . The non-wildland extent was adjusted to account for the development, were not already accurately captured.

Overview: Model Error – The Office of the State Fire Marshal received 6 comments that were concerned that the model should be adjusted for vegetation and burn probability. . The comment ID's that relate to those comments are as followed below: [(Yolo County: 551), (Santa Cruz County:1910), (Monterey County: 2025 & 2655), (Orange County: 2751) &(Los Angeles County: 2359)].

Response: No changes were made to the regulation in response to these comment. CAL FIRE reviewed the zoning and underlying data in these areas, where necessary and determined that hazard was appropriately classified based on the vegetation composition and burn probability.

Overview: Model Error – The Office of the State Fire Marshal received 2 comments that were concerned that the model should be adjusted for wind and burn probability. The comment ID's that relate to those comments are as followed: [(San Diego County: 811 & 823)].

Response: No changes were made to the regulation in response to these comments. CAL FIRE reviewed the zoning and underlying data in these areas, where necessary and determined that hazard was appropriately classified based on the vegetation composition and burn probability. Residence referenced in the comment is ~150 m from large, steep block of chaparral; in this region due to winds and burn probability that arrangement results in a Very High designation.

Overview: Model Error – The Office of the State Fire Marshal received 3 comments that were concerned that the model should be adjusted for vegetation composition, slope, and burn probability. The comment ID's that relate to those comments are as followed below: [(San Luis Obispo County: 976), (Glenn County:1010) & (Lake County: 1019)].

Response: No changes were made to the regulation in response to these comments. CAL FIRE reviewed the zoning and underlying data in these areas, where necessary and determined that hazard was appropriately classified based on the vegetation composition, slope, and burn probability.

Overview: Model Error – The Office of the State Fire Marshal received 2 comments that were concerned that the model should be adjusted for vegetation composition, slope, burn probability, and direction of fire winds. The comment ID's that relate to those comments are as followed: [(San Diego County: 2662) & (Ventura County:2348)].

Response: No changes were made to the regulation in response to these comments. CAL FIRE reviewed the zoning and underlying data in these areas, where necessary and determined that hazard was appropriately classified based on the vegetation composition, slope, burn probability, and the dominant direction of fire winds modeled in this area.

Overview: Model Error – The Office of the State Fire Marshal received 6 comments that were concerned that the model should be adjusted for completed development and adjusted for similar fuels and fire likelihood. The comment ID's that relate to those comments are as followed below: [(San Diego County: 1733 &1974), & (Ventura County: 2568, 2569, 2571 & 2572)].

Response: CAL FIRE reviewed the zoning and underlying data in these areas. FHSZ was adjusted in one wildland polygon to improve consistency in hazard mapping across similar fuels and fire likelihood. In addition, the non-wildland extent was adjusted to account for the development, where not already accurately captured.

Overview: Model Error – The Office of the State Fire Marshal received 4 comments that were concerned that the model should be adjusted because neighboring properties were zoned different. The comment ID's that relate to those comments are as followed below: [(Placer County:111), (El Dorado County: 1953), (Santa Cruz County: 2205) & (Solano County: 2298)].

Response: No changes were made to the regulation in response to these comments. In non-wildland areas, zone edges occur based on distance to the wildland edge. Because hazard in these areas is largely determined by incoming embers from adjacent wildland, urban areas that are similar in vegetation type and housing density may have a change in FHSZ class as the distance to the wildland edge increases. Areas immediately adjacent to wildland receive the same FHSZ score as that wildland where fire originates, and the model then produces lower scores as the distance to wildland edge increases. In wildland areas, zone edges are a result of the way zones are delineated. Specifically, zones represent areas of similar slope and fuel potential. Zone boundaries divide zones based on geographic and vegetation features that align with fire hazard potential; although, at a local scale, it may appear that the immediate area is similar on both sides of the edge. The class value within a zone is based on the average hazard score across the whole zone, so areas that are in the same zone but not immediately adjacent to a local area can have an influence on the final zone classification.

Overview: Model Error – The Office of the State Fire Marshal received 3 comments that were concerned that the model should be adjusted for recent fires within a given area. The comment ID's that relate to those comments are as followed below: [(Amador County: 1140), (Los Angeles County: 1442) & (Santa Cruz County: 1598)].

Response: No changes were made to the regulation in response to this comment. Recent fires (through 2020) do factor into burn probability in the model, as they reflect trends in fire likelihood within similar climate and fuel groupings. Like other temporary mitigations such as fuel treatments, the effect of wildfires on fuel loads is limited due to vegetation regrowth or type conversion. Because some of the most critical fire safety regulations involve construction materials and methods, which are influential over the entire life of a structure, FHSZ utilizes fuel

conditions that reflect the maximal hazard condition likely to occur over a 30-50 year time horizon.

Overview: Model Error – The Office of the State Fire Marshal received 3 comments that were concerned that the model should be adjusted for FRA land that is going to be annexed into SRA or LRA, specific to Concord Naval Weapons Station. The comment ID’s that relate to those comments are as followed below: [699, 759, 1142].

Response: No changes were made to the regulation in response to these comments. Regarding the area of former Concord Naval Weapons Station- a large portion has been transferred from the Navy to East Bay Regional Parks. This takes the land out of FRA and puts it in SRA or LRA. This land should have corresponding FHSZ's attached to them. Additionally, in the next 24-36 months it is anticipated additional transfers will take place from FRA to LRA. This land should be pre-zoned for FHSZ purposes.

Overview: Model Error – The Office of the State Fire Marshal received 6 comments that were concerned that the model should be adjusted to include the burn scar specific to the Dixie fire. The comment ID’s that relate to those comments are as followed below: [2268, 601, 678, 682, 2145, 2282].

Response: No changes were made to the regulation in response to this comment. We calculated burn probability early in the modeling process and 2020 was the most recent year available at that time. If the Dixie Fire were included in the model, it would impact burn probability, but not fire behavior estimates. Like other temporary mitigations such as fuel treatments, the effect of wildfires on fuel loads is limited due to vegetation regrowth or type conversion. Because some of the most critical fire safety regulations involve construction materials and methods, which are influential over the entire life of a structure, FHSZ utilizes fuel conditions that reflect the maximal hazard condition likely to occur over a 30-50 year time horizon.

Individual: Model Error Comments

ID 3431, Comment: A site-specific analysis of the Avila Beach Resort appears to highlight an over exemplification of wildfire hazard as identified in CAL FIRE’s Draft 2022 Fire Hazard Severity Zone Map. CAL FIRE is urged to undertake a deliberate and meaningful effort to reevaluate Fire Hazard at the Avila Beach Resort. Changes in the Fire Hazard Severity Zone Mapping of the Avila Beach Resort from the current 2007 maps are provided in Figure 1. Existing Site Observations. The Avila Beach Resort covers 169 acres in the town of Avila Beach in San Luis Obispo County (Figure 2 -Avila Beach Resort Ownership). The site includes an 18-hole golf course, driving range, and recreational and tourist facilities. The Resort hosts numerous recreational activities typically associated with a resort, including golf, weddings, banquets, food and beverage service, and commercial entertainment. Limited portions of the property remain in their natural state including San Luis Creek, Harford drainage, limited oak woodlands and its sandy beach areas. Most of the Resort is maintained, irrigated turf. Public access is provided through roads and trails from Highway 101 to Avila Beach. The well-established and traveled Bob Jones Trail ends at the Resort’s 3000 Avila Beach Drive intersection. ABR Property L.P. (“Applicant”) is in the process of requesting approval of a phased Development Plan/Coastal Development Permit to add hotel and related facilities to the Avila Beach Golf Resort. These overnight accommodations expand the existing visitor-serving and recreational uses at the

Resort. Site Specific Wildfire Hazard Assessment Dudek understands that CAL FIRE models wildfire hazard differently depending on an area's classification as either wildland or non-wildland. CAL FIRE defines wildland areas as those "that lack a fuel model and include urban, agriculture, barren areas, and water bodies/wetlands." A site-specific assessment of the Avila Beach Resort highlights that the area should be considered non-wildland for the following reasons. The Avila Beach Golf Course covers the majority of the ownership. The golf course is irrigated throughout the entirety of the year and grasses are well maintained. Healthy turf is less likely to burn due to high water content within the plant tissue. Golf courses often serve as fire breaks and safe refuge areas, as further described here. San Luis Creek passes through the central portion of the Avila Beach Resort. This wetland area has strong tidal influence due to close proximity to the Pacific Ocean and retains water year-round. The FVEG dataset utilized in CAL FIRES FHSZ Model classifies many areas of Avila Beach Resort as "Urban" (Figure 3 - FVEG Dataset) Where natural vegetation does exist, it is often surrounded by non-natural areas including irrigated turf or roadways. Since it is proposed that wildfire hazard of the Avila Beach Resort property should be classified a non-wildland area, the following Fire Hazard Severity Zone classification approach applies. "The initial zone classification is the same as the adjacent wildland, with buffers of lower FHSZ classes modeled at further distances from the wildland boundary. The width of the FHSZ buffer is a function of brand load, slope, and the amount of tree cover within the non-wildland area. The FHSZ buffer into non-wildland is wider in areas that have higher brand load, steeper slope, and greater tree cover. Note that non-wildland areas that are sufficiently far from wildland remain unzoned, in contrast to wildland, which always receives a zone designation." A site-specific assessment of the Avila Beach Resort including in person field work was conducted to assess the basis for CAL FIRE's expansion of the Very High Fire Hazard Severity Zone classification. Wildfire Hazard in Adjacent Wildlands Wildfire hazard in adjacent wildlands was modelled using the Probability of Extreme Wildfire Behavior Dataset created by Pryologix under contract by the US Forest Service (Figure 4 - Probability of Extreme Wildfire Behavior). The majority of wildlands surrounding the Avila Beach Resort are not shown to have high likelihood of experiencing extreme fire behavior. Where areas of extreme fire behavior are more likely, most commonly occurring on hillslopes with coastal scrub vegetation, these areas slope up and away from the Avila Beach Resort which exists downslope from surrounding hillslopes. Therefore, wildfires burning in adjacent wildlands are not expected to produce a substantial and direct threat. In addition, fire history in adjacent wildland areas is fairly limited with only 10 wildfires occurring within 5 miles of the site since 1965 according to CAL FIRE's Fire History Database (Figure 5 - Fire History). The region's coastal proximity is believed to most often minimize the weather conditions that are needed for vegetation ignitions and spread. Ember Brand Load Ember brand load related to the number or mass of embers likely to land per unit area. Ember load is quantified where embers land (after being lofted at another location). CAL FIRE determines ember brand production as function of cover type, modeled flame length, and burn probability. Surrounding areas in the proximity of Avila Beach Resort are not believed to produce substantial ember production due to the majority fuel types present. Vegetation types surrounding the Avila Beach Resort are mainly comprised of Oak woodlands, grasslands, and coastal scrub. While ember production can occur in all fuel types, certain vegetation communities are known to be more hazardous. Dense & woody vegetation often produces greater ember loads compared to herbaceous/flashy fuels. Ember production is often most severe from torching trees which can loft a large number of embers at great distances. However, oak trees are less susceptible to ember production as the leaves do not readily catch

fire. Fires in oak stands tend to smolder in the duff and consume surface fuels without generating enough heat to carry fire into the oak canopy (USFS 2015). Oaks also do not spread fire crown-to-crown readily like many conifers (Sonoma Veg Map 2018). While crown fire is possible in oak woodlands, maintenance of understory and ladder fuels greatly reduces the transition of surface to crown fire. Ember brand load at the Avila Beach Resort was modelled using the Ember Load Index Dataset created by Pyrologix (Figure 6 - Ember Load Index). This dataset among others is provided to the public through the California Wildfire and Forest Resilience Task Force and considered the most relevant and reliable geospatial data at this time by scientists from CAL FIRE, US Forest service, UC Berkely, and UC Irvine. Ember load at the Avila Beach Resort is modelled to be low-moderate. In addition, spot fires are unlikely to ignite at the site due to the widespread coverage of irrigated turf which would not likely propagate wildfire spread. In addition, trees are not likely to ignite due to limited fuel availability in the understory. Slope Steepness CAL FIRE uses slope steepness of non-wildland areas as an input to determine the FHSZ buffer width in non-wildland areas as steeper slopes can promote greater fire ignition and spread. Buffer widths of adjacent wildland FHSZs are extended further in non-wildland areas with steeper slopes, As provided in Figure 7, The Avila Beach Resort is considered flat terrain. The terrain of the Avia Beach Resort is not believed to be conducive to fire ignition and spread resulting from offsite wildfires. Tree Cover Tree cover at Avila Beach Resort is limited to patches along golf holes. The resulting overall canopy cover is low given significant spacing between clumps of trees. Because of this, it is unlikely that widespread wildfire would be spread through tree canopies. Concerns Relating to the Vegetation Data Used in CAL FIRE's FHSZ Model An assessment of the FVEG dataset used by CAL FIRE to model wildfire hazard highlights inaccuracies that have the potential to greatly influence the determination of wildfire hazard. An overlay of this vegetation data with Avila Beach Resort is provided in Figure 3. Data errors include: Misclassification of urban areas including parts of Downtown Avila Beach and golf and parking areas as shrub vegetation. Classifying shrub vegetation in areas that are annual grasslands. Classifying hardwood woodlands in areas that are grasslands. These errors are likely to have over exemplified wildfire hazard both within the Avila Beach Resort and in adjacent wildland areas. It is recommended that vegetation data in this area be assessed for its accuracy prior to the finalization of FHSZ maps. Conclusion It is argued that the Avila Beach Resort represents a non-wildland area and that the site's Fire Hazard Severity Zone Designation should be determined accordingly. A site-specific analysis of the site and adjacent offsite wildland areas does not suggest that a Very High Fire Hazard Severity Zone is appropriate for the following reasons: Offsite fuels are not likely to result in significant ember cast within the site. On-site landscapes do not represent fire-facilitating fuelbeds for ember ignitions Onsite fuels are minimal, the majority of which are irrigated year-round. A riparian corridor/wetland travels through the central portion of the site and retains water throughout the year. The site is flat and exists downslope of fire prone hillslopes. Tree canopy coverage is confined to patches and is not likely to increase risk of onsite wildfire spread. Based on these findings, the Avila Beach Resort owners request CAL FIRE reevaluate the draft Fire Hazard Severity Zone mapping of the Avila Beach Resort and consider the information provided in this report when determining the extent of the VHFHSZ.

Response: Adjust urban footprint to include neighborhoods on either side of Lupine Canyon Rd. Agree that the fuel model for mixed chaparral was leading to overestimation of hazard in some areas. Coastal scrub has a range of pixel flame scores in this area depending on burn probability,

which depends on the surrounding vegetation. Edited the more coastal areas dominated by grass, scrub, and oak woodland with overall lower fuel density from VH to H.

ID 2024, Comment: March 24, 2023 Office of the State Fire Marshal C/O: FHSZ Comments California Department of Forestry and Fire Protection P.O. Box 944246 Sacramento, CA 94244-2460 Re: Santana Ranch Santana Ranch is in San Benito County east of Fairview Road and generally located between Sunnyslope Road and Hillcrest Road. This subdivision has been zoned in the 2007 and 2023 State Responsible Area (SRA) Fire Hazard Severity Zone map as Moderate shown in attachment "1". Anderson Homes, the developer for Santana Ranch respectfully requests your consideration to reclassify this area in the Fire Hazard Zoning Map and eliminate the zone designation. We have provided the following attachments, and comments below for your review. Access routes to get in and out of the area are located at Sunnyslope and Hill crest east of Fairview Road. Standard location of Fire Hydrants is per Sunnyslope County Water District detail attachment "2". Asphalt streets and street scape have been constructed in Phases 1 to 8 as shown in attachment. This subdivision is contracted with the City of Hollister Fire Department. The station location is 5th and Sally Street, 2.25 miles away from Santana Ranch. CalFire is adjacent to the subdivision and centrally located east of Fairview Road between Sunnyslope Road and Hillcrest Road. The address is 1979 Fairview Road, Hollister, Ca 95023. The location is also labeled on attachment "3" Undeveloped areas of the subdivision are graded with minimal slopes. These areas are mitigated with discing and weed removal. There are three site photos showing the development to the south and the undeveloped areas to the north in attachment "4" Phases 1 to 9 have been assigned San Benito County approved addresses as shown in attachment "5" I have attached for your reference and use the most current assessor's parcel map 025-370 shown in attachment "6". Attachments: 1. 2007 and 2023 State Responsible Area (SRA) Fire Hazard Severity Zone Map 2. Sunnyslope County Water District, Fire Hydrant Location and Notes, Standard Plan W-1-2 3. Santana Ranch Phasing Overlay Exhibit 4. Site Photos: Santana Ranch North, Santana Ranch South, and CalFire 5. Santana Ranch Address Map 6. Assessor's parcel map 025-370 Thank you for your time and consideration. Sincerely, Regina Waldron Vice President Anderson Homes

Response: No changes were made to the regulation in response to this comment. All SRA is classified into Moderate, High or Very High FHSZ. This area falls into Moderate, the lowest hazard class.

ID 224, Comment: The base map depicting building footprint in relation to overlay fire hazard risk is skewed (base map for housing appears to be an out of date version - it does not reflect the GIS hazards map used by Santa Cruz County planning. We live in Felton at 498 Fall Creek Terrace. The base map supporting this fire hazard map does not reflect the topography (inaccurate location of structures) nor the extent of current structures. Thus, a smaller version of our house is shown, no garage appears, and the location of the home in relation to roads and hill terrain is not accurate. Given the failure to fully capture topography the spatial dimensions are completely off. Thus, our home appears quite far from our neighbors who are in the moderate risk category on Fall Creek Terrace on your map when, in fact, our home and structures are only a few feet apart in distance. the most recent hazards assessment by the County of Santa Cruz based on satellite imagery: all the homes on Fall Creek Terrace were determined to be moderate risk. Thus, in times when evacuation has been ordered for fire or flood risk, our neighbors on Fall Creek Drive leave but we stay put. The flawed imagery in the base map means that no home

insurer in our area will renew our homeowner insurance policy. Barbara Rose Johnston, PhD498
Fall Creek Terrace Felton, California 95018

Response: No changes were made to the regulation in response to this comment. Basemap of imagery was not used in developing Fire Hazard Severity Zones. CAL FIRE reviewed the zoning and underlying data in this area and determined that hazard was appropriately classified based on the vegetation composition, slope, and burn probability.

ID 1499, Comment: Santa Lucia Community Services District 121 Rancho San Carlos Road, Building A Carmel, California 93923 (831) 293 -4767 Re: California Code of Regulations, Title 19, Division 1, Chapter 17 Public Comment for Fire Hazard Severity Zone 2022 2/17/2023 Dear Chief Potkey, Thank you for providing the FHSZ maps. The models used in determining these maps help us understand the relative magnitude a fire may exhibit on a landscape, which is important for incentivizing action in reducing our potential wildfire risks. However, it is important to note that on-the-ground observations by experienced experts in fire behavior should override model predictions. In this case, I would like to draw your attention to two areas in the Santa Lucia Preserve, a 20,000-acre conservation and Firewise community in Monterey County, that have been categorized as very high (red), when they were previously downgraded in the high category (orange). In the 2022 proposed FHSZ map (zoom into coordinates: 36.456348, -121.807193), it shows the first area, a group of the Preserve's main facilities (circled in Figure 1, the Hacienda, Sports Club and Equestrian Center), tightly encompassed in red, most of which consists of hardscaping, sand, structures, and lawn. It is in a relatively flat valley with sparse to no tree cover and is surrounded by marshland, a lake and riparian zone. This area was previously used as a staging area during the 2016 Soberanes Fire, exhibiting its usefulness as a strategic location and safety zone for fire personnel, and will be used again as discussed in our wildfire pre-attack plan with Cal Fire BEU and Monterey County Regional Fire District. I understand that these facilities are located near very high fire hazard areas, but the probability of embers igniting in this area is unlikely. In addition, this area was recently used in Oct. 2022 as a staging area for a 70-acre prescribed burn in the adjacent marshland to the northwest of the Hacienda (Figure 3), where we had fire personnel from both Cal Fire BEU and Monterey County Regional Fire District participate, increasing their area familiarization and local fire behavior knowledge while building a cohesive relationship with our staff and community.

Regarding predicted flame lengths in this first targeted area of discussion, a Fuel Management Plan was created for the Hacienda, where flame length models were predicted to be under two feet within 500 feet of structures where mowing has occurred (please see attached document). I understand fuel mitigation is related more to fire risk than fire hazard, but considering that this area is the Preserve's active center, is slated for a safety zone during the next wildfire, and its defensible space is annually inspected using an LE-100 and fuel management plan, the maintenance of this area is ongoing as we have the inhouse capabilities and funding to conduct the work. Our close collaborative relationship with both of our fire agencies as well as our proximity to our neighboring communities motivates us to carry out this fuel reduction and maintenance in perpetuity to increase wildfire safety at the Santa Lucia Preserve. The second targeted area I would like to direct your focus to is the southeastern half of the Santa Lucia Preserve Golf Course (Figure 4, zoom to coordinates: 36.441970, -121.786873), which also changed from orange to red. Please take a close look at that location as I believe it should remain in the orange category. Lastly, I encourage you to reach out to the local fire experts in Monterey County, who have personally been to the Santa Lucia Preserve and either fought fires here,

conducted training, or worked closely with our community, to discuss the potential fire hazard of the targeted areas outlined in this document (see suggested contacts below). Kevin Kamnikar, Division Chief/Training Officer, Monterey County Regional Fire District, kkamnikar@mcrfd.org David Sargenti, Chief, Monterey County Regional Fire District, dsargenti@mcrfd.org Brice Muenzer, Fire Captain/Pre-fire Planning, Cal Fire BEU, Brice.Muenzer@fire.ca.gov Thank you so much again for your review and consideration of keeping the two targeted areas of discussion in the orange category. Sincerely, Emily Aiken Fire and Fuels Management Specialist, Santa Lucia Preserve E: eaiken@santaluciapreserve.com M: 831-239-4767 MS in Environmental Science, Technology and Policy NWCG-qualified GISS Nationally Registered EMT

Response: CAL FIRE adjusted FHSZ in this area to better align the zones with underlying fuels.

ID 430, Comment: January 12, 2023 Chief Daniel Berlant Acting State Fire Marshal Office of State Fire Marshal CAL FIRE 715 P Street Sacramento, CA 95814 SUBJECT: CAL FIRE's Fire Hazard Severity Zone Map Dear Chief Berlant: I am writing to express my concern over the rollout of the Department of Forestry and Fire Prevention's (CAL FIRE) 2022 Draft Fire Hazard Severity Zone (FHSZ) maps for the State Responsibility Area (SRA). Specifically, I am concerned about the lack of sufficient time that CAL FIRE has given the public to provide comment on the draft SRA maps, and the significant impacts that the proposed SRA maps will have when adopted. Wildfire hazard mapping is a helpful tool. With these updated SRA maps, CAL FIRE proposes a 14.6 percent increase to the Very High Hazard classification statewide. Within the 21st Senate District, Los Angeles County will see a 14.2 percent increase and San Bernadino County gets a 6.9 percent increase. These changes are considerable and will have real consequences. I am sure CAL FIRE agrees that the public has a right to understand the changes proposed and to participate in the process. It is disappointing to learn that CAL FIRE initiated a minimum public comment timeline of 45-days launched over the holidays and proceeded with hearings during January's devastating winter storms through a state of emergency declared by Governor Newsom. The public comment period is inadequate considering the Department is advancing significant hazard mapping changes over one-third of California's land mass. Aside from the process, I am concerned that CAL FIRE's modeling is not transparent. It fails to consider the substantial fuel load disparities found in distinct geographic areas of the SRA for the Very High Hazard classifications. In regards to fuel loads, the rural, heavily wooded landscapes found in Northern California should not be considered equivalent to the low grasslands and high desert conditions of my district and across Southern California. When it comes to the fuel load intensity of fire in Very High Hazard designation, one size does not fit all. At a time when the Governor and the legislature have correctly shined a light on California's housing crisis, I fear these maps will be used to attack well-planned, fire safe housing. For example, master planned communities are well-considered and built to modern, Chapter 7A building code standards. Recent legislative sessions have seen efforts to prohibit development of any kind, including these safe master planned communities, within the SRA. As CAL FIRE considers how to reconcile its advancement of hazard maps with its support for communities safely built under Chapter 7A and with defensible space, the Department should clarify the proper usage of hazard maps so that they are not misused. Additionally, like the administrative ability FEMA uses to change federal flood maps, CAL FIRE should also recognize improvements to hazard classifications and accurately reflect a beneficial change when a hazard condition is transformed through development. Should CAL FIRE need statutory clarification to achieve this sort of accuracy in its mapping efforts, please let my office know. The public deserves a reasonable extension to the

public comment period before CAL FIRE moves to adopt these maps. The updates to the FHSZ maps are important, but all Californians deserve a legitimate and more thoughtful response than what CAL FIRE has originally considered. I encourage CAL FIRE to extend the comment period beyond February 3, 2023, and to seriously consider the public's input in this consequential mapping effort. Thank you for your consideration. Sincerely, Scott Wilk Senator, 21st District
cc: Chief Joe Tyler Secretary Wade Crowfoot Governor Gavin Newsom

Response: CAL FIRE adjusted FHSZ in this area, where necessary to better match the climate and burn probability of the given area.

ID 2686, Comment: RE: FHSZ Penny Angel32793 Sapphire Rd. Lucerne Valley, CA, 92356 San Bernardino County Written Comment #3 Dear Sirs: I recently attended a local meeting here in Lucerne Valley, California, where and outline of a proposed fire zoning change/changes was discussed. I have been a resident of California for close to 62 years + my husband close to 75 years. We purchased our home here in Lucerne Valley in 2012, doing so because we liked the smaller, rural community, where we can live out our days. We had fire insurance initially, with a company called Liberty Mutual. One year later they cancelled our insurance because because they said we lived they said we lived in a "High Zone" area. Fortunately we were able to combine our, car home + fire insurance with another company. I work at our local market + hardware store, due to needing to be close to my husband who is on hospice care. I make \$17.00 per hour. When my husband passes it will be extremely challenging to hold on to our home. A change in fire zoning + the cost incurred (upwards of \$5,000 per year pending a company that might carry us is not only daunting, but a matter that fills us with anxiety. There has not been a wild fire in Lucerne Valley since The 1800s, so newly studied computer generated "possibilities" aren't very actual. We live in a tract home area, surrounded by rocks and sand. There are fire hydrants strategically placed throughout the area for fire protection usage. Please do not allow This proposed zoning change to go through! We are a poor community, people who support each other, grandparents raising their grandkids on Their social security, etc. We all have dreamed of having homes. Our voice is against this fire zoning change ... after all this area has been the same location of rocks and sand for hundreds of years + very little has changed. Thank you for hearing me (us) on This matter. May God guide you in all fairness of your decision making. Respectfully, Penny Angel

Response: CAL FIRE adjusted FHSZ in this area, where necessary to better match the climate and burn probability of the local area.

ID 193, Comment: Please find MOFD's comments pertaining to the draft SRA FHSZ maps below. MOFD is concerned that numerous areas of the fire district's SRA land have been changed from Very High to High Fire Hazard Severity Zones. Given the unchanged nature of the topography, the increased number of Red Flag Diablo Wind days and the increases in fuel load since the 2007 maps were published, this appears to be at odds with our understanding of fire behavior and the ongoing potential for significant uncontrolled wildfire in this area. Specific areas of concern are: 1. Watershed lands Wests of San Pablo Reservoir, to include mature Eucalyptus groves along San Pablo Dam Road and heavy concentrations of decadent brush on NE facing slopes with full exposure to Diablo Winds. This area was previously classified as VHFHSZ and is bracketed by areas with less exposure to prevailing winds which retained the VHFHSZ designation. 2. Park and watershed lands along State Highway 24 and Grizzly Peak Blvd/Skyline Blvd in the Berkeley-Oakland Hills. While small portions of Sibley Volcanic Park

have minimal vegetation due to their former use as a rock quarry, the remainder of these areas consist of decadent brush, Eucalyptus groves, heavy ground fuels and topography with significant exposure to Diablo Wind events. 3. Park and watershed lands South of Pinehurst Road IVO the unincorporated community of Canyon. It is simply inexplicable that this area has received a reduced FHSZ designation as the areas are characterized by steep slopes, heavy fuel loads, and are identical to the surrounding SRA areas which retained the VHFHSZ designation. Thank you, Dave Winnacker Fire Chief Moraga-Orinda Fire District

Response: CAL FIRE adjusted FHSZ in this area to better match the slope and fuel type of the local area.

ID 1133, Comment: County of Del Norte Board of Supervisors 981 "H" Street, Ste. 200 Crescent City, California 95531 January 24, 2023 Office of the State Fire Marshal C/O: FHSZ Comments California Department of Forestry and Fire Protection P.O. Box 944246 Sacramento, CA 94244-2460 Fire Hazard Severity Zones Public Comment Period Dear Director Berlant, Thank you for the opportunity to provide comments on the draft Fire Hazard Severity Zone (FHSZ) maps for the State Responsibility Area (SRA) advanced by the Department of Forestry and Fire Protection (CAL FIRE) and the Office of the State Fire Marshall. High-level wildfire hazard mapping is a valuable tool for all Californians and we appreciate your work to further protect livelihoods of those who live and work in these areas of the state. The County of Del Norte would like to submit comments on two items: 1) the amount of time that local jurisdictions and the public have been given to review the updated maps, and 2) local areas where FHSZ designations have changed that likely need further analysis. Process, Timing, and Method First, the County would like to express concerns regarding the unreasonably short 45-day comment period and the need for the agency to provide more time for local jurisdictions to review the map changes. The public and stakeholders impacted by the maps have been provided a mere 45-days to review and comment without all of the relevant underlying methodologies employed by the agency. The FHSZ designations determine, among other things, planning decisions, building code applications, and availability and cost of residential home insurance. Impacts from these changes are going to be extensive state-wide, and local jurisdictions need more time to consider and plan for those impacts. Additionally, rushing the public disclosure and comment period by giving Californians only 45 days to evaluate maps that took years to develop, especially without understanding the underlying methodologies employed, will frustrate meaningful input and, more importantly, may result in inaccurate map designations. Thus far, outreach and the public hearing process within Del Norte County has been completely ineffective. The public hearing held in the County of Del Norte on January 11, 2023, resulted in a total of five participants all of whom work for the County Government. The total count of members of the public or press that attended the meeting was exactly zero. This lackluster outcome does not reflect lack of work by the County Government, nor the work done by local CAL FIRE employees, to publicize the meeting in a very short amount of time; rather, it shows that the process being used across the state to solicit public comment is flawed and completely ineffective in its intended purpose. Extension of the public comment period would ensure that this public process is truly informed by the public, and would give local jurisdictions and CAL FIRE time to more effectively solicit public comment on the changes. In addition to lack of adequate time to fully review maps, tools provided to identify changes are severely lacking. The best tool jurisdictions have been provided is an SRA FHSZ Rollout Application map with a slide function to compare the changes between the 2007 designations and those that are proposed. Refusal to release any geospatial data, or even

simply highlight changed areas, has left local jurisdictions on their own to search for changes made, with limited ways to accurately identify all changes made to the maps. Staff for the County of Del Norte resorted to creating hand-drawn maps to more effectively track where the changes are proposed and what the changes would be. The lack of tools provided has created difficulties for local jurisdictions seeking to understand where the changes are proposed to occur. The increased work to identify changes, combined with the short comment period, has led to many local jurisdictions scrambling to analyze the maps_ and provide comment. Lastly, the agency has released extremely limited information on the methodology used to make the zone determinations on the maps. The public cannot be expected to give effective comment on the maps when they are not able to first view or understand the modeling and processes that generated the maps. While the County recognizes the years of work behind the model and the many brilliant minds that have contributed to the model through the years, rural Del Norte County has a history of being forgotten in state-wide decision-making processes. Our corner of California is vastly different than the rest of the state in terms of weather and climate, and County staff needs review the methodologies utilized to generate the FHSZ maps to verify that the science accurately reflects conditions on the ground and provide comment if it does not. Initial specific area comments listed below reflect some of the areas we've already identified concerns with. Initial Specific Area Comments Areas listed in Attachment A have been identified by staff as areas of concern. Without viewing the inputs and model outcomes, it's impossible to identify what the driving factors were in the decision to designate these areas as currently proposed. Staff utilized the aforementioned SRA FHSZ Rollout Application to prepare the attachment. Within the application, it is not possible to change the opacity of the proposed FHSZ layer, making it even more difficult to see where the changes begin and end on the ground. Staff has elected to keep specific comments relatively short on each area, in anticipation of more information being released and extension of the public comment period.

1. California-Oregon Border to Oceanview Drive The California-Oregon border area seems to have been somewhat arbitrarily designated as Very High, while it was previously designated as Moderate. This is the only place in the county where there is a straight line in the mapping, which caught the attention of staff. Given that we don't have any data to view, it's impossible to tell what occurred in the model at this location to cause this designation. This area should be reviewed and revised.
2. North of Smith River near US 101 Highway A small strip of land along the US 101 Highway, north of the community of Smith River, is proposed to be designated as Very High and High, while the previous designation was moderate. Based on conditions in the area, staff is unsure of what caused this area to be designated as proposed. The area is generally devoid of significant vegetation and is no different from other areas along the highway. The house just north of the highway shown on the map is proposed to be moved into the Very High designation. This location needs revision, as the map does not accurately reflect ground conditions.
3. South of Smith River near US 101 Highway. The area east of the US 101 Highway, just south of the community of Smith River, is proposed to be moved into High and Very High designations, while the previous designation was Moderate. Staff would like to view more information on why this area is proposed to be designated as proposed, given that the designation will affect many houses in the area.
4. Big Flat The valley area in the community of Big Flat is proposed to be designated as Very High, as opposed to the previous High designation. Staff would like to view more information on why this area is proposed to be designated as proposed, given that the designation will affect many houses in the area.
5. Patrick J. Murphy Memorial Drive (Requa Community) Portions of land along Patrick J. Murphy Memorial Drive in the Requa area are

proposed to have High FHSZ designations, as opposed to the existing moderate designation. Given the vegetation in the area, staff is questioning why these specific areas are proposed to be designated as such. Areas with dense vegetation are indicated as Moderate, while the areas proposed to be High have less dense vegetation coverage. Additionally, there is a portion of the beach associated with the mouth of the Klamath River that is proposed to be designated as High FHSZ. The beach is completely devoid of vegetation, which made staff further question the results from the model in this area. This area likely needs to be revised. 6. Klamath Glen Large portions of the Klamath Glen community are proposed to be moved into the Very High FHSZ designation, from the previous Moderate designation. Staff was most concerned with this area, given the potential long-term implications of this designation, and would like to view more information on why this area is proposed to be designated this way. Although it is difficult to tell where the Very High FHSZ designation ends, it looks as though all homes within the levee area are proposed to be in the Very High designation. CLOSING The County of Del Norte asks that CAL FIRE and the Office of State Fire Marshal provide a summary of the variances between the 2007 and 2022 models, release the underlying modeling inputs and algorithm information, and provide a reasonable extension of the public comment period of 60 additional days from the current February 3, 2023 deadline. If you have any questions, please contact Heidi Kunstal, Community Development Director, by email at hkunstal@co.del-norte.ca.us or by phone at 707-464-7254. Respectfully submitted, Darrin Short, Chair Attachments: A. Existing versus Proposed SRA FHSZ Designation Maps CC Senator McGuire Assemblyman Wood CSAC RCRC

Response: CAL FIRE corrected this error. FHSZ boundaries were adjusted to match the underlying wildland zone polygon geometry and FHSZ class. This area is part of a larger wildland zone that extends to the NE. While pixel level flame length and burn probability are lower within the valley, due to the Very High hazard in the adjacent area, which is also upwind on days when fire weather is the worst, along with the narrow geometry and alignment with winds the Very High rating is appropriate in this location.

ID 1231, Comment: VIA E-MAIL Office of the State Fire Marshal California Department of Forestry and Fire Protection P.O. Box 944246 Sacramento, CA 94244-2460 Attn: Scott Witt, Deputy Chief fhszcomments@fire.ca.gov Re: Public Comment on Notice of Proposed Rulemaking – Fire Hazard Severity Zones, 2022 Dear Deputy Chief Scott Witt, On behalf of the proponents of the South Camino Pablo Annexation Project, we submit these comments on the Notice of Proposed Rulemaking – Fire Hazard Severity Zones (“FHSZ”), 2022 prepared by CalFire. 1 The proponents of the South Camino Pablo Annexation Project object to the redesignation of the project site from a High Fire Hazard Severity Zone to a Very High Fire Hazard Severity Zone since the Project was previously analyzed under a Mitigated Negative Declaration which concluded that there would be no significant impacts to the area from wildfire. 2 I. DESCRIPTION OF THE PROJECT The South Camino Pablo Annexation Project (“Project”) is located at Camino Pablo at Tharp Drive, Town of Moraga Assessor’s Parcel Number (“APN”) 258-290-023. The Project is proposing to develop an 8.5-acre residential subdivision of 13 single-family homes on the southern portion of the property as seen in Fig. 1. As the MND notes the Property is currently only designated as a High Fire Hazard Severity Zone. 3 1 Notice Of Proposed Rulemaking Action - Fire Hazard Severity Zones, 2022, STATE OF CALIFORNIA-THE RESOURCES AGENCY, last accessed Feb. 2, 2023.

2 The South Camino Pablo Annexation Project, Mitigated Negative Declaration, Camino Pablo Subdivision MND-2020 FINAL, last accessed Feb. 2, 2023. 3 The South Camino Pablo Annexation Project, Mitigated Negative Declaration, at p. 179, Camino Pablo Subdivision MND-2020 FINAL, last accessed Feb. 2, 2023. Office of the State Fire Marshal February 6, 2023 Page 2 Fig. 1 Project Outline II. CALFIRE’S RULEMAKING ADJUSTS CURRENT DESIGNATIONS OF FIRE HAZARD SEVERITY ZONES The Office of the State Fire Marshal (“OSFM”) is proposing amendments to, and the relocation of, the regulation in 14 CCR, Section 1280, which designates FHSZ in State Responsibility Area (“SRA”). Within this section are referenced maps titled “Maps of the Fire Hazard Severity Zones (FHSZ) in State Responsibility Areas of California. November 21, 2022”.⁴ FHSZs are geographical areas (lands) designated pursuant to PRC Sections 4201- 4204 and classified as Very High, High or Moderate in SRA. Each zone is assigned one of these ratings to reflect the degree of severity of fire hazard that is expected to prevail in the zone. The zones are designated so that measures may be identified which will reduce the potential for losses to life, property, and resources from wildfire. Building standards are effectuated by the proposed FHSZ maps, meaning some building code requirements will depend on the hazard zone in which the building is located. While OSFM maps fire hazard severity for the entire State, the map/zones 4 Notice Of Proposed Rulemaking Action - Fire Hazard Severity Zones, 2022, STATE OF CALIFORNIA-THE RESOURCES AGENCY, last accessed Feb. 2, 2023. Office of the State Fire Marshal February 6, 2023 Page 3 proposed for adoption in this regulation apply only to the SRA.⁵ CalFire released the current draft redesignations in November of 2022. III. CALFIRE’S UNDERLYING ANALYSIS IN REDESIGNATING FIRE HAZARD SEVERITY ZONES ONLY FORECASTS THE “EXPECTED” SEVERITY AT SPECIFIC LOCATIONS CalFire released the underlying methodology for the redesignations and which takes into account vegetation type, slopes, watersheds, etc.⁶ This methodology notes how the risks differ between wildland vs. non-wildlands and assigned module numbers 1 through 4 to categorize the type of risks present for each. While this methodology may be appropriate on a state wide basis when large swathes of land need to be designated the methodology notes that it “reflect[s] the degree of severity of fire hazard that is expected to prevail in the zone,” and thus may be incorrect when compared to site-specific analysis.⁷ IV. THE MND CONCLUDED THAT THERE WOULD BE NO SIGNIFICANT IMPACTS FROM WILDFIRE As part of the CEQA process, the MND was required to review whether the Project would face significant impacts from wildfires. In this analysis the MND notes that “[t]he grassy slopes exposed to the prevailing westerly winds could contribute to the spread of a wildfire. However [...] the project site is not located in proximity to any substantial fuel sources (e.g., trees), and would receive first response fire protection from the Moraga-Orinda Fire District (MOFD), which has a fire station approximately 2 miles from the project site. Therefore, the project is not expected to expose the proposed homes or their residents to a significant risk of wildland fires. The project would have a less-than-significant impact due to exposure to wildland fires.”⁸ Additionally, the MND’s wildfire analysis concluded that “[t]he project site is fully served by existing roads, water supply, and fire-fighting services”, and “[w]hile a new street would be constructed from Camino Pablo to provide access to the proposed homes, the road would not exacerbate fire risk, and the potential impacts from its construction have been addressed.”⁹ Given 5 Notice Of Proposed Rulemaking Action - Fire Hazard Severity Zones, 2022, STATE OF CALIFORNIA-THE RESOURCES AGENCY, last accessed Feb. 2, 2023. 6 FHSZ Underlying Methodology, CalFire, last accessed Feb. 2, 2023, short_fhsz_methods_072022.pdf (ca.gov) 7 Notice Of Proposed Rulemaking Action - Fire

Hazard Severity Zones, 2022, STATE OF CALIFORNIA-THE RESOURCES AGENCY, last accessed Feb. 2, 2023; FHSZ Underlying Methodology, CalFire, last accessed Feb. 2, 2023, short_fhsz_methods_072022.pdf (ca.gov). 8 The South Camino Pablo Annexation Project, Mitigated Negative Declaration, at p. 180, Camino Pablo Subdivision MND-2020 FINAL, last accessed Feb. 2, 2023. 9 Id. Office of the State Fire Marshal February 6, 2023 Page 4 this site specific analysis demonstrating no significant impacts from wildfires, CalFire should take a second look at the redesignation of this site. V. CALFIRE SHOULD PRESERVE THE CURRENT DESIGNATION BECAUSE RECENT SITE-SPECIFIC ANALYSIS CONTRADICTS THE “EXPECTED” SEVERITY OF FIRE HAZARD AS IT RELATES TO THE PROJECT SITE. Given the MND’s analysis and conclusions that there would be less than significant impacts from wildfire, we request that CalFire maintain the current designation because recent site-specific analysis contradicts the “expected” severity of fire hazard as it relates to the Project site. Sincerely, FENNEMORE WENDEL Darien Key DKEY

Response: No changes were made to the regulation in response to this comment. CAL FIRE reviewed the zoning and underlying data in this area and determined that hazard was appropriately classified based on the vegetation composition and burn probability. The wind data used in FHSZ is different in this case than that in the fire study referenced in the email. The area may have predominantly west winds when looking at the entire set of wind data but the winds that occur under the worst conditions of fire weather on record in the area are predominately out of the NNE, with 86% occurring in the 10-20 mph class and 7% in the 20-30 mph class.

ID 2351, Comment: April 3, 2023 Office of the State Fire Marshal c/o: FHSZ Comments California Department of Forestry and Fire Protection P.O. Box 944246 Sacramento, CA 94244-2460 Draft Fire Hazard Severity Zone Maps (November 21, 2022) Irvine Company Comments Dear Chief Berlandt: The Irvine Company appreciates the opportunity to provide the following comments in relation to the California Department of Forestry and Fire Protection's ("CAL FIRE's") Draft Fire Hazard Severity Zone Maps dated November 21, 2022 (the "Draft FHSZ Maps"). This comment letter is divided into three (3) sections: Section A Introduction to the Irvine Company and the Irvine Ranch Section B Project Specific Comments Regarding the Draft FHSZ Maps Section C Requests of Current SRA Map Process and Forthcoming LRA Map Process Irvine Company traces its early roots to the 1860's with the initial formation of the Irvine Ranch, totaling 120,000 acres. Today, Irvine Company is a private real estate investment company governed by an independent Board of Directors. Irvine Company is respected for its master planning and environmental stewardship of the Irvine Ranch in Orange County, including diversified operations throughout coastal California. Irvine Company brings to life neighborhoods and sustainable communities with a full range of housing, jobs, retail centers, schools, parks and open space. During the last 40 years, under Donald Bren's leadership and vision, the Irvine Company has professionally planned and master built the all-new City of Irvine and the Newport Coast, creating one of America's most desirable regions. The City of Irvine currently has a population of more than 300,000 growing to an estimated 325,000 people over the next 10 years, with an equal number of employment positions. Irvine Company is committed to long-term ownership and operations of a high-quality real estate portfolio, the breadth of which is unmatched in the industry. With each property positioned at the top of its class, the company's holdings consist of 129 million square feet and include more than 590 office buildings, 125 apartment communities with 65,000 units, 40 retail centers, one coastal resort, three golf courses, and five marinas. The company's investment property portfolio is largely

located in Orange County, with about thirty-five percent of the portfolio located in Silicon Valley, San Diego, West Los Angeles, Chicago and New York City. As an environmental planner, Irvine Company has a long and successful history of land preservation. Irvine Company established one of California's largest nature preserves by permanently dedicating more than half of the Irvine Ranch- 57,500 acres - to open space and parklands. It is the only land in California to receive both the California State and United States National Natural Landmark designation. The Chairman of the Board of Directors of Irvine Company is Donald Bren. Section B Project Specific Comments Regarding the Draft FHSZ Maps. The first concern we have is the age of the data being used in the calculations for the fire hazard severity zones. According to the information provided, the source of the fuels data is from the Vegetation CAL FIRE FRAP 2015 file (<http://map.dfg.ca.gov//metadata/dsl327.html>). As shown below in Figure 2, the data for the area of our current project in the City of Orange (adjacent to the SRA) includes fuels data from 1997. Several newer fuel layers are available within the Landfire database which are more current and more accurately reflect the current conditions. Our second concern is why the significant change from "Moderate" and "High" to "Very High" hazard classification in the SRA areas surrounding our project area. The State has indicated that, "The fire hazard severity model for wild/and fire has two key elements: probability of an area burning and expected fire behavior under extreme fuel and weather conditions. The zones reflect areas that have similar burn probabilities and. fire behavior characteristics. The factors considered in determining. Fire hazard within wild/and areas are fire history, flame length, terrain, local weather, and potential fuel over a 5 0-year period. Outside of wild/ands, the model considers factors that might lead to buildings being threatened, including terrain, weather, urban vegetation cover, blowing embers, proximity to wild/and, fire history, and fire hazard in nearby wild/ands." If the fire hazard in the nearby wildland will be a consideration, we need to understand "why" the adjacent areas have been increased from "Moderate" and "High" to "Very High". Figure 3, on the above, provides a direct comparison. The Irvine Regional Park area is of specific quandary. This area is covered with mostly oak trees, the majority of the understory is replaced with irrigated grass. The park contains many parking lots, stables and other areas without wildland fuels. The Irvine Company donated the park lands 1897 and it has been a regional park ever since. In Figure 4, below, the relationship of the park to the project site is provided. The Regional Park serves as a "fuel break" for the project site and in the previous hazard maps, this was evident but not in the 2022 maps. While historic fires have burned around and spotted over the park, the age and condition of the park indicates that the park has not been consumed by these fires over the past 125 years. In the past 103 years, the fire history records indicate that five large fires have burned over the Regional Park and Project site. The average return interval is just over 25 years for large fire activity. The Irvine Company understands that these areas are a part of the overall wildland hazard but question the outcome as being in the highest category available given the amount of fuel available, the fire history and the position of the Regional Park. (Name, year, Interval, Acres) No name, 1914, 18,759, Green River, 1948, 34 53,080, Paseo Grande, 1967, 19 51,076, Gypsum, 1982, 15, 20,142, Canyon II, 2017, 35, 9,198 = Average 25.8, 30,451. Figure 4 It is also worth noting that Irvine Regional Park has traditionally served as the Incident Command location for the Orange County Fire Authority when fighting wildland fires in the SRA. Thousands of fire and support personnel rely on the refuge provided by the park, its open spaces and tree canopy as a gateway to provide fire suppression to SRA fires. OCF A has invested significant time, energy and resources in planning and preparing for the continued use of the site as such. A final concern is that indication that the modeling uses the most extreme data points

within the dataset. In the State Frequently Asked Questions, it states, "The updated model will adjust fire intensity scores based on the most extreme fire weather at a given location, considering temperature, humidity, and wind speed." Flood zones are not created using 1,000 year floods and it does not seem to be appropriate to use the 100th percentile for wind/weather data. The Fremont Canyon RAWS is located approximately 2.75 miles to the NE of the project site. A review of the data from the site for the past 10 years (2013 to 2022) is provided in Figure 6, on the next page. Of specific note is the difference between the 100th and 99th percentiles in terms of the wind speeds. Using the highest values the wind/gusts are 66 mph wind and 94 mph gusts. At the 99th percentile, the values are 35 mph wind and 54 mph gusts. The difference is significant. Wind data values only exceed 60 mph in 87,159 data points. The wind gust only exceeded 70 mph 0.1 % of the time. We would like to understand the wind/weather values used to create the new fire hazard zone ratings. It is also worthwhile to note for the record that the project site referenced herein represents the potential for the City of Orange completing fully one-third of its Regional Housing Needs Allocation (RHNA). At a time when cities are struggling to meet their share of the state's needed 2.5 million units of housing, this plan may jeopardize the achievement of the state's housing goals in the City of Orange. Section C Requests of Current SRA Map Process and Forthcoming LRA Map Process Revisions to Draft FHSZ Maps. In light of the information presented in this letter, the Irvine Company would request the following: 1. Use of more current data in the evaluation process. 2. Access to the assumptions used in the evaluation process before they are adopted. The current position related in the Frequently Asked Questions (FHSZ geospatial data files are currently not available during the adoption process. The regulation incorporates the map by reference, and it is presented as an accurate and tractable representation of the data; release of the data could compromise the integrity of the data causing misrepresentation of the map and regulation. Upon completion of this process, the FHSZ maps will become formally adopted; at that time geospatial data files will become available.) is not an acceptable position. It is impossible to comment on process and data implications when they are not provided. Transparency is imperative. 3. We request a re-evaluation of the SRA areas adjacent to our project site area given the nature of the fuels adjacent to it (specifically the Regional Park). Revisions to the Future Map Processes A. As areas continue to develop over the next 20+ years, the need will certainly arise for periodic revisions to CAL FIRE's published fire hazard severity maps in order to account for changes in land use and to reconcile CAL FIRE's maps to actual development conditions within the project area. Notably, the Irvine Company anticipates that its development activities will be substantial following CAL FIRE's adoption of its current fire hazard severity zone map update and the time that CAL FIRE prepares and adopts its next map update (i.e., five (5) years or more). Based upon Irvine Company's projections, CAL FIRE's current map update will soon become outdated due to mass grading of the site. To that end, we respectfully request that CAL FIRE establish a program protocol for receiving, reviewing and processing changes to CAL FIRE's maps that are appropriate and necessary for the periods between CAL FIRE's regular map update cycles. In the absence of an intra-cycle map revision process, the risk exists for mischaracterization of lands and the creation/perpetuation of problems which are attendant to such misidentifications (e.g., the inability to obtain fire insurance coverage for lands located within the high or very high fire hazard severity zones). Dave Prolo President Irvine Company Community Development.

Response: No changes were made to the regulation in response to this comment. CAL FIRE reviewed the zoning and underlying data in this area and determined that hazard was appropriately classified based on the vegetation composition and burn probability. While

vegetation currently is affected by the 2017 fire, this area and the wildland to the NE is modeled to return to chaparral/scrub. The weather data used isn't just the very rare once in 100 years events. It amounts to the worst 10% of days (so 36.5 days per year on average) and then on those days the most severe 5% of hours, which comes out to an average of 44 hours per year. Over a 100-year period these conditions would be expected to occur for 4400 hours total, across 3650 days.

ID 204, Comment: Hello, I am writing to submit comments to the proposed hazard severity zone maps. We are the owners at 7548 Bennett Valley Rd, Santa Rosa, CA 95404 and believe that the proposed map has an oversight that should be corrected. It appears that the map divides our property into High hazard and Very High hazard zones, and this appears to be based on the start of a large hill where the elevation quickly climbs. The methodology makes logical sense, but the map itself is off by a couple hundred feet which might have significant impacts on us. The topography of our property is that the elevation gain does not start until after our home (with some separation). But as you can see from the map (photo below), the map incorrectly buckets our home into the steeper elevation bucket and into a Very High hazard zone (when it should be High only). The green drawn line on the photo is approximately where the hillside begins, which should not include the home. Thank you for your consideration!

Response: No changes were made to the regulation in response to this comment. CAL FIRE reviewed this in detail and found that the pattern of slope variation at the property exists at a finer scale than the 30 m scale used in the model. Using a finer scale slope area would likely expand the Very High zone to the north to include the slope below the house. The flat spot where the house is located is only about 30 m, which is one pixel wide in model inputs and too small to be considered its own zone.

ID 742, Comment: Good morning. My name is Nathan Keith and I work for Williams Homes, a local home builder with 25 years' experience of home building here in Southern California and the western United States. One the thank you for the opportunity to come speak on the fire hazardous severity maps zones that were released. We do have concerns with the small time period to review them, especially given that was released over the holidays. We respectfully ask that you extend the comment period 60 days for us at our company to give time to the overlook at the overview of the maps and understand how it affects. Specifically, three projects that have been approved through the local jurisdiction, these projects have gone through the sequel process, have been reviewed by LA County Fire. Have the state mandated fuel mod in place and are inconsistently put in as high fired areas when the adjoining neighborhoods that we share infrastructure and streets with are outside the maps? The extra 60 days would allow us time to work with Cal Fire. Sorry, the extra 60 days would allow us to work with Cal Fire to understand the inconsistencies of why these approved projects, so they're currently being built and have residents live in them are considered high fire when their neighbors just across the street are not. Thank you for your time.

Response: FHSZ changed in this area because the new map treats agricultural areas as non-wildland, and scores them with a buffer routine that is based on the hazard originating in the adjacent wildland. Hazard comes out Very High in this area due to high burn probability. The weather data used isn't just the very rare once in 100 years events. It amounts to the worst 10% of days (so 36.5 days per year on average) and then on those days the most severe 5% of hours, which comes out to an average of 44 hours per year. Over a 100 year period these conditions

would be expected to occur for 4400 hours total, across 3650 days. Areas with no vegetation are zoned using a buffer routine because we don't have fuel models to represent houses, although they can burn and contribute to fire spread. In the case of non-wildlands where the buffers occur the mechanism of ignition is often a result of fire brands originating from adjacent wildland vegetation.

ID 720, Comment: Hello, The zones in Solano County are extreme changes. The fire conditions in the Rockville area and specifically in Rockville Heights do not warrant these changes. Much of the area placed into more severe zones is grassland that is grazed. The fuel models do not support the upgrade in severity zones. Specifically I am speaking of Rockville Heights, parts of Rockville Road, Rockville Park, Oakwood Drive, parts of Suisun Valley Road and Stonefield Lane. These area do not have any history of significant fires. The upgrade in zones is not supported. One extreme example is the zones have been changed to put a flat green, irrigated cemetery into a high zone. This makes no sense. These zones have been created haphazardly.
Aaron McAlister

Response: FHSZ in this area gets buffered in from an adjacent wildland polygon, which is very large and had a hazard score highly influenced by the higher hazard in the south part of the polygon. CAL FIRE edited this polygon and reclassified the northern side, which is dominated by lighter fuels, from Very High to High. FRA designations will not be part of the official regulation; however, CAL FIRE reviewed FRA lands within this polygon to ensure consistent mapping.

ID 2361, Comment: April 4, 2023 Office of the State Fire Marshal C/O: FHSZ Comments California Department of Forestry and Fire Protection P.O. Box 944246 Sacramento, CA 94244-2460 fhszcomments@fire.ca.gov RE: Notice of Proposed Rulemaking Action (NOPA), California Code of Regulations, Title 19, Division 1, Chapter 17, relating to the classifying of lands in the State Responsibility Area (SRA) into Fire Hazard Severity Zones (FHSZs). Dear Office of the State Fire Marshal: The Tuolumne County Board of Supervisors appreciates the opportunity to comment on the notice to adopt proposed regulations pursuant to Public Resources Code (PRC) Sections 4202-4204, relating to the classifying of lands in the State Responsibility Area (SRA) into Fire Hazard Severity Zones (FHSZs). Tuolumne County is a forestry-and tourism-based small economy located in the foothills of the Sierra Nevada mountains and has the same interest as the Office of the State Fire Marshal in reducing loss of life and property from catastrophic fires. However, the County must balance that common goal with the priorities of ongoing residential growth and by promoting a healthy local economy. The framework of this is accomplished via thoughtful land use regulation, as almost all of the County is located either in the SRA or VHFHZ, the County recognizes that much of its development guidelines hinge on the details and designation of fire severity zones within the county. If those regulations change severity zones within certain communities, population growth in the County will stagnate, with no future here for the next generations of Tuolumne County to look forward to. The County is already severely limited in its development potential, with only 22.64% of lands in private ownership. The remaining 77.36% of lands, mostly comprised of National Forest, BLM, or National Parks lands, are in public ownership. As the County seeks to reduce fire risk, the proposed regulations appear, at least in part, to slightly increase the amount of acreage of very high and high designations, thus potentially impacting a need to consider them in updating and implementing our general plan. The Tuolumne County General Plan encourages

development within certain areas of the County that have available infrastructure and are not located within a very high or high zone as based on the previous severity designations. A change and increase in the areas designated would contradict the General Plan in the Goals, Policies, and Implementation Programs to direct future growth and development within certain areas. This would further limit the areas of the county that are feasible and recommended for future growth based on the General Plan. Tuolumne County does object to the science-based modelling of how these designations were made as it does not apply to our local area. There are several communities that have an increase of severity while literal neighbors with steeper slope do not. While we understand that insurance companies use risk models (not hazard) and the Insurance Commissioner has publicly stated that fire severity zones are not used in determining risk, we would like local area data to be considered. Per a recent study conducted by a retired USFS GIS Specialist and local College Instructor, Jim Schmidt, in his paper titled and attached "Defensible Space, Housing Density and Diablo -North Wind Events: Impacts on loss rates for homes in Northern California Wildfire", high-wind events during the fire season are much more common in the San Francisco Bay Area (called Diablo Winds) and in the Sierras north of Lake Tahoe (called North Winds). These types of winds are rare in Tuolumne County during the fire season. No instances of such winds were found in the last 20 years at the Mt. Elizabeth or Bald Mountain weather stations and only one event at the Green Springs weather station. We request that local data be used for the hazard model and severity designations. While we appreciate the broad objective to ensure that the people of California understand the degree of severity of fire hazard that is expected to prevail in the zone in which they live, implementation of measures that will reduce the potential for losses to life, property and resources from wildfire will come at a cost to both private individuals and the local government that must implement such measures. We ask that you consider efforts that our communities, individual property owners and our County have already taken to prevent/mitigate wildfire by eliminating the hazards that increase wildfires. Measures such as hazardous fuels reduction, creation of Firewise communities, management of millions of dollars of grant funds to implement the Master Stewardship Agreement or Social and Ecological Resilience Across the Landscape (SERAL) project, and roadside brushing along key access routes. All the work that we have accomplished and have identified as a priority within our community should be considered as actually eliminating those hazards that the modeling has identified for severity zone designations. In closing, while we understand that insurance companies use risk models (not hazard), and that the Insurance Commissioner has publicly stated that fire severity zones are not used in determining risk. Tuolumne County currently has the highest number of California Fair Plan policies, and we cannot continue with such impacts. Tuolumne County has the highest percentage of insurance per capita on the Fair Plan in the State, at 31.9% yet our community has lost the least number of homes, especially when compared to other counties throughout the state. Any changes to perceived risk or severity designations by insurance companies will likely increase insurance premiums for our community. Please consider our request in using local data and the measures we have taken to reduce the hazards for wildfire in our community. Thank you for your time and consideration of the Board's comments. Should you have any questions regarding our comments or wish to discuss our concerns further, please feel free to reach out. Sincerely, Supervisor Kathie Chair, Tuolumne County Board of Supervisors Cc: RCRC CSAC California Assembly Member Jim Patterson California State Senator Marie Alvarado-Gil

Response: No changes were made to the regulation in response to this comment. Local climate data, including local winds at a 2 km scale, were used in determining FHSZ statewide. Most of

Tuolumne County SRA gets a decrease in estimated potential fire intensity due to the impact of local climate, with some areas getting only a modest increase.

ID 543, Comment: Just in case these comments didn't get to the right person or persons, I am resending to make sure that the appropriate parties received my email comments: I am submitting my comments regarding the FHSZ Mapping updates, as a concerned professional that works in CEQA related projects on a regular basis: It appears that very little public input has been considered during the preparation of the updated mapping. Many areas that include high or very high severity zones occur in areas that are developed or conflict with areas that are considered for development of new housing (a State priority) and therefore have standards that would mitigate fire hazard issues. No mitigation guidelines have been provided for agencies to adopt for assisting applicants of in the design process, which means that reasonable mitigation will be difficult to support in a CEQA environment and subject to broad interpretation. My request is simple: take some more time to develop the mapping for each County utilizing stakeholder input and collaboration. Identify a list of solutions that will inform the CEQA guidelines and provide applicants with a palette of acceptable mitigations BEFORE adopting these maps. Thank you for your consideration, please distribute these comments to the appropriate parties. Tim Walters Principal, Engineering 3765 S. Higuera Suite 102 San Luis Obispo, CA 93401 (805) 543-1794 rrmdesign.com

Response: No changes were made to the regulation in response to this comment. Project timelines may be uncertain and variable, therefore wildland areas targeted for development are not considered part of the non-wildland until construction has begun.

ID 2055, Comment: April 4, 2023 VIA EMAIL: fhszcomments@fire.ca.gov Office of the State Fire Marshal C/O: FHSZ Comments California Department of Forestry and Fire Protection P.O. Box 944246 Sacramento, CA 94244-2460 RE: Comments on Draft Fire Hazard Severity Zones, 2022 California Code of Regulations, Title 19, Division 1, Chapter 17 Dear Chief Berlant: On behalf of Ponderosa Homes II, Inc., we appreciate the opportunity to provide the following comments in relation to the CAL FIRE's Draft Fire Hazard Severity Zone Maps dated November 21, 2022 (the Draft FHSZ Maps). We own/option land and in the State Responsibility Area (SRA) that we are in the process of developing. We have reviewed the Draft FHSZ Maps and would like to provide you with the most up-to-date information regarding how the vegetation, slope, and other land modifications may have changed from the information that CAL FIRE is working from. We hope that this information will help CAL FIRE produce the most accurate maps possible. Both of these properties consisting of 123 acres lie within the City of Pleasanton Sphere of Influence and are designated for residential use in the City's General Plan. We are currently processing entitlements for a residential subdivision and related improvements. The project will include 28 lots, open space managed by an HOA and the development of an East Bay Regional Parks District staging area/trailhead along with the dedication of approximately 70 acres to EBRPD. We anticipate project approvals in late 2023 and construction to commence in 2025. As you can see from the aerial photograph, the properties consist primarily of grasslands which are typically grazed. There are trees along the adjacent creek and some concentrations of native Coast live oak and California bay trees which are not adjacent to most of the development areas of the site. Also included is a site plan of the proposed project indicating the development area. Also please note that the site has excellent access to Dublin Canyon Road, a two-lane arterial which serves Pleasanton and parts of Alameda County providing excellent access to the

site. Note that these properties are currently designated as High FHSZ and we are requesting a review of this classification for our properties. As we continue to implement our development plans over the next 2-4 years, the need will certainly arise for periodic revisions to CAL FIRE's published fire hazard severity maps to account for changes in land use and to reconcile CAL FIRE's maps to actual development conditions. To that end, we respectfully request that CAL FIRE establish a process for receiving, reviewing, and processing changes to CAL FIRE's maps for the periods between CAL FIRE's regular map update cycles. In the absence of such a process, the risk exists for mischaracterization of lands which can lead to the inability to obtain development approvals for future phases and fire insurance coverage for lands located within the high or very high fire hazard severity zones. Thank you for considering our comments on the Draft FHSZ Maps. We respectfully request that CAL FIRE incorporate the information we have provided into the production of the Draft FHSZ Maps. Should you have any questions regarding these comments, please contact me through the information provided below Sincerely,

PONDEROSA HOMES II, INC. Jeffrey C. Schroeder Senior V.P., Land, Planning & Operations
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April 4, 2023 VIA EMAIL: fhszcomments@fire.ca.gov Office of the State Fire Marshal
C/O: FHSZ Comments California Department of Forestry and Fire Protection P.O. Box 944246
Sacramento, CA 94244-2460 RE: Comments on Draft Fire Hazard Severity Zones, 2022 California Code of Regulations, Title 19, Division 1, Chapter 17 Dear Chief Berlant: On behalf of Greenville Road Land Company and Patterson Pass Land Company, we appreciate the opportunity to provide the following comments in relation to the CAL FIRE's Draft Fire Hazard Severity Zone Maps dated November 21, 2022 (the Draft FHSZ Maps). We own land in the State Responsibility Area (SRA) that we are in the process of developing. We have reviewed the Draft FHSZ Maps and would like to provide you with the most up-to-date information regarding how the vegetation, slope, and other land modifications may have changed from the information that CAL FIRE is working from. We hope that this information will help CAL FIRE produce the most accurate maps possible. Both of these properties consisting of 345 acres lie within the City of Livermore Sphere of Influence. We are currently working with the City to include these properties along with several other properties on Greenville Road in the City's 2024 General Plan update currently in preparation. These properties, located across from or in close proximity to the Lawrence Livermore National Laboratory and other Livermore industrial properties, are proposed for industrial and commercial development. As you can see from the aerial photographs, they consist of primarily grasslands and related agricultural uses, are typically grazed or managed via disking and are nearly absent of any significant vegetation. Moreover, both of these properties are located to the west of the South Bay Aqueduct, which provides a barrier from the adjacent grasslands. These parcels are also relatively flat in topography as are most of the properties west of the Aqueduct. In fact, most of the greater area in nearby, lying south of Interstate 580 and east of or adjacent to the Altamont Hills consist almost entirely of grasslands or agricultural parcels which are grazed, planted or otherwise managed. Finally, a portion of Parcel 1 was recently sold to Topcon Positioning Systems, an international firm based in Livermore which manufactures laser-based, drone guided and computerized land grading and farming systems for use as a testing facility. The County of Alameda has approved permits for development of this portion (60 acres) of the site. Note that these properties are currently designated as High FHSZ and we are requesting a review of this classification for our properties. As we continue to implement our development plans over the next 2-4 years, the need will

certainly arise for periodic revisions to CAL FIRE's published fire hazard severity maps to account for changes in land use and to reconcile CAL FIRE's maps to actual development conditions. To that end, we respectfully request that CAL FIRE establish a process for receiving, reviewing, and processing changes to CAL FIRE's maps for the periods between CAL FIRE's regular map update cycles. In the absence of such a process, the risk exists for mischaracterization of lands which can lead to the inability to obtain development approvals and fire insurance coverage for lands located within the high or very high fire hazard severity zones. Thank you for considering our comments on the Draft FHSZ Maps. We respectfully request that CAL FIRE incorporate the information we have provided into the production of the Draft FHSZ Maps. Should you have any questions regarding these comments, please contact me through the information provided below Sincerely, GREENVILLE ROAD LAND COMPANY PATTERSON PASS LAND COMPANY Jeffrey C. Schroeder Partner 5020 Franklin Drive, Ste. 200 Pleasanton, CA 93588 jschroeder@ponderosahomes.com (925) 998-8586M

Response: No changes were made to the regulation in response to this comment.

Project timelines may be uncertain and variable, therefore wildland areas targeted for development are not considered part of the non-wildland until construction has begun. CAL FIRE reviewed the zoning and underlying data in this area and determined that hazard was appropriately classified based on the vegetation composition and burn probability. Based on the way the model is run Statewide and affects both the SRA and LRA, an appeals process that attempts to update one development at a time is currently not feasible.

ID 2325, Comment: Dear State Fire Marshal, Attached please find a technical letter concerning the Fire Hazard Severity Zone Mapping for our property known as Valiano in San Diego County. The properties contained herein are currently mapped as "Moderate" fire risk (2007 SRA FHSZ) while the new 2022 mapping shows it as "Very High" fire risk. To further clarify, we are formally requesting the Valiano properties remain as "Moderate" per the 2007 SRA FHSZ mapping. This area is urbanized and will continue to do so evidenced by recent constructed large residential developments like Harmony Grove Village and Sunrise, and also the new Rancho Santa Fe Fire Station #5. This new construction is in addition to existing residential, mobile home park, industrial park and Palomar Hospital. The data and information in the attached technical letter provides justification for our request. Please include this email as part of our public comment. Respectfully, Gil Miltenberger, VP Integral Communities 760.519.6145 gmiltenberger@integralcommunities.com This comment letter is in response to the Draft 2022 Fire Hazard Severity Zone Maps which have expanded the Very High Fire Hazard Severity Zone designation at the Valiano Project Site in San Deigo County. CAL FIRE is urged to undertake a deliberate and meaningful effort to reevaluate Fire Hazard at the Valiano Project Site based on the information presented herein. Changes in the Fire Hazard Severity Zone Mapping of the Valiano Project Site from the current 2007 maps are provided in Figure 1 – Valiano Project Location. Existing Site Observations. The Valiano Specific Plan is a single-family residential development on approximately 230 acres in an unincorporated area of North County San Diego (Figure 2 - Valiano Project Site). The majority of the development is within the community of Eden Valley; the southern portion of the development is within the community of Harmony Grove. The Valiano Specific Plan is situated adjacent to the City of San Marcos to the north and west, and Escondido to the north and east. When fully developed, Valiano will provide 326 residential units on varying lot sizes in small groupings of homes within five neighborhoods.

The western majority of the site includes remnant agricultural areas of Avocado and citrus. Natural areas in the Project Site are comprised mainly of annual grasses with smaller areas of oak woodland and coastal scrub. Land uses adjacent to the site include low density residential areas and natural shrub vegetation to the west, dense residential housing to the north, medium density residential areas to the east, and the Harmony Grove community to the south. Exhibit 1. Aerial image of the Valiano Project Site looking west showing onsite agricultural areas and adjacent open space and residential properties. Site Specific Wildfire Hazard Assessment Dudek understands that CAL FIRE likely modelled wildfire hazard for the Valiano Project Site differently for non-wildland (Agricultural and Urban) and wildland areas (natural vegetation) within the site (Figure 3 – FVEG Vegetation Map). The following Fire Hazard Severity Zone classification approach applies to non-wildland areas at the site. “The initial zone classification is the same as the adjacent wildland, with buffers of lower FHSZ classes modeled at further distances from the wildland boundary. The width of the FHSZ buffer is a function of brand load, slope, and the amount of tree cover within the non-wildland area. The FHSZ buffer into non-wildland is wider in areas that have higher brand load, steeper slope, and greater tree cover. Note that non-wildland areas that are sufficiently far from wildland remain unzoned, in contrast to wildland, which always receives a zone designation.” In wildland areas, Fire Hazard Severity Zones are classified by multiplying flame length with burn probability. Flame lengths in wildland fuels are determined by assigning a fuel model to each wildland pixel based on vegetation data derived from the FVEG dataset and modelling wildfire behavior during 95th percentile weather conditions. Burn probability is determined at the vegetation strata level and based on fire history from 1991-2020. Wildfire Hazard in Adjacent and Onsite Wildlands Wildfire hazard in adjacent and onsite wildlands was modelled using the Probability of Extreme Wildfire Behavior Dataset created by Pryologix under contract by the US Forest Service (Figure 4 - Probability of Extreme Wildfire Behavior). The vast majority of the Valiano Project Site and adjacent wildlands are modelled to have a minimal potential for extreme wildfire. Extreme wildfire in adjacent wildlands is most likely to occur during Santa Ana weather conditions which increase wildfire severity through strong offshore winds. The site’s eastern and downslope proximity to wildland areas lessens the likelihood of experiencing direct wildfire impacts. Wildfires burning in wildlands to the west are likely to travel upslope and be driven away from the site in alignment with the typical offshore wind direction observed during Santa Ana wind events. Additionally, unlike some sites which are surrounded on all sides by wildlands, continuous wildlands are only present to the west of the site. If wildfires do occur in the project’s vicinity, they are likely to only encroach upon the site from one side. This provides the unique opportunity to emphasize wildfire hazard mitigation strategies on this edge area including wide fuel modification zones, fire resistant landscaping, and additional structural hardening measures beyond baseline requirements. Ember Brand Load Ember brand load related to the number or mass of embers likely to land per unit area. Ember load is quantified where embers land (after being lofted at another location). CAL FIRE determines ember brand production as function of cover type, modeled flame length, and burn probability. Surrounding areas in the proximity of the Project are not believed to produce substantial ember production due to the majority fuel types present. Ember brand load was modelled using the Ember Load Index Dataset created by Pyrologix (Figure 5 - Ember Load Index). This dataset among others is provided to the public through the California Wildfire and Forest Resilience Task Force and considered the most relevant and reliable geospatial data at this time by scientists from CAL FIRE, US Forest service, UC Berkely, and UC Irvine. Ember load at the Valiano Site is modelled to be low. Concerns Relating

to CAL FIRE's 2022 Fire Hazard Severity Zone Methodology A review of CAL FIRE's updated Fire Hazard Severity Zone modeling methods highlights areas of concern that are believed to have the potential to misrepresent wildfire hazard. Burn Probability CAL FIRE utilizes Burn Probability as a major influencer of wildfire hazard, with areas experiencing high burn probabilities corresponding to a higher wildfire hazard. Unlike the typical approach which simulates the likelihood of wildfire ignition and spread across the landscape based on the spatial distribution of natural fuels and terrain, CAL FIRE's model assigns the same burn probability to all pixels within a given vegetation strata and does not account for site specific landscape characteristics. It is Dudek's opinion that this methodology may lead to a misrepresentation of actual burn probability at the Valiano site and potentially other sites on the updated map given extensive development in the project's vicinity which greatly reduces the potential for wildfire spread. Fuels Data CAL FIRE derives fuels data from the FVEG dataset which provides vegetation data at a 30-m resolution. However, the accuracy of this dataset is unreliable due to the source year of the data. For example, vegetation data in some areas of the Valiano Site is from 1996. Outdated vegetation data does not account for land use changes including disturbance and urbanization which greatly influence wildfire hazard onsite and in adjacent areas. Fire Hazard Severity Zone boundaries CAL FIRE relies on watershed boundaries in combination with vegetation classification (3 classes) and slope (2 classes) to define Fire Hazard Severity Zone Boundaries with a minimum size of 200 acres. It is argued that this approach does not adequately account for site-specific factors that may have the potential to greatly reduce wildfire hazard. A more granular depiction of wildfire hazard based on site-specific details is needed to when classifying Fire hazard Severity Zones. Clarify the Intent of Fire Hazard Severity Zone Maps to Prevent Negative Consequences to Housing 1. CAL FIRE should clarify the intended use of Fire Hazard Severity Zone maps and enforce that the maps are not intended to prohibit development that is appropriately designed to mitigate wildfire risk. 2. CAL FIRE should clarify that the Fire Hazard Severity Zone maps identify wildfire 'hazard' and do not quantify wildfire 'risk' to prevent misuse by insurance providers. 3. CAL FIRE should initiate an appeal process that follows a far shorter time frame than the current map update requires to remove an area from a VHFHSZ after it has been developed to account for the conversion of natural vegetation into urbanized areas. 4. Providing local fire agencies purview over their jurisdictions and CalFire focusing on its SRA, unincorporated areas, to avoid conflicts from application of coarse scale analysis vs local hazard assessments which are based on site-specific assessments. Conclusion The Valiano Project Applicant request CAL FIRE reevaluate the draft Fire Hazard Severity Zone mapping of the Valiano Project Site and consider the information provided in this report when determining the extent of the VHFHSZ. CAL FIRE is also urged to clarify the intent of Fire Hazard Severity Zone maps to prevent their misuse as a mechanism to prevent new development. In addition, CAL FIRE should develop a process for removing areas from VHFHSZs to account for site-specific changes occurring after new development.

Response: No changes were made to the regulation in response to this comment. Project timelines may be uncertain and variable, therefore wildland areas targeted for development are not considered part of the non-wildland until construction has begun. In non-wildland areas, zone edges occur based on distance to the wildland edge. Because hazard in these areas is largely determined by incoming embers from adjacent wildland, urban areas that are similar in vegetation type and housing density may have a change in FHSZ class as the distance to the wildland edge increases. Areas immediately adjacent to wildland receive the same FHSZ score as that wildland where fire originates, and the model then produces lower scores as the distance to

wildland edge increases. In wildland areas, zone edges are a result of the way zones are delineated. Specifically, zones represent areas of similar slope and fuel potential. Zone boundaries divide zones based on geographic and vegetation features that align with fire hazard potential; although, at a local scale, it may appear that the immediate area is similar on both sides of the edge. The class value within a zone is based on the average hazard score across the whole zone, so areas that are in the same zone but not immediately adjacent to a local area can have an influence on the final zone classification.

ID 3010, Comment: Since the Second public comment period is now open, coincidentally on the same day I sent my Second request for SRA changes in the Tiburon Fire District Map showing SRA, this is my third attempt. I do understand the public comment process, but due to a "Corrected" version of the Second Open Public Comment Period letter dated Monday July 26, 2023 and the screen shot response below..... my confidence is low that I am being truly received: Please advise if I need to send a fourth comment. Respectfully, Michael Lantier Fire Marshal

Response: Yes, comment was received, as well as comments which are ID number: 2933, 99, 2931, and have been responded to. No changes were made to the regulation in response to this comment. SRA reviews are conducted on 5-year cycles. CAL FIRE has cataloged the geospatial data of each 5-year review change since 1995. In reviewing the data, it appears the area in Tiburon became SRA during the 2000 review. The change code (the reason for the change in responsibility area) is noted as 'USE - landuse, typically loss of watershed value due to a combination of crops and development.' This coding is normally, as is implied, for loss of watershed value and a reason for areas leaving SRA. One can infer that, due to this coding, during the 2000 review this area was cited as having watershed value that meets the thresholds for coming under state responsibility. Unfortunately, no other documentation can be found around this change.

ID 3549, Comment: August 16, 2023 Office of the State Fire Marshal C/O: FHSZ Comments California Department of Forestry and Fire Protection P.O. Box 944246 Sacramento, CA 94244-2460 fhszcomments@fire.ca.gov RE: Public Comment on Proposed Updated June 15, 2023 FHSZ map from Jazmin Hinojosa 13956 Calle Bueno Ganar, Jamul CA 91935 Dear State Fire Marshal: I am writing to ask for reconsideration of the classification of both my specific home located at 13956 Calle Bueno Ganar, Jamul CA 91935, but also the neighborhood I reside in and the surrounding area. I believe all should be classified as Moderate based on historical fire data, as well as the topographic, vegetation, and development patterns in the immediate vicinity. This area of Jamul should not be lumped in with the larger area of Jamul which has severe topography, unmanaged open space, and large areas that are inaccessible to fire vehicles. The proposed June 15, 2023 FHSZ map has a portion of the neighborhood in High Fire area and a portion in Very High. My home 13956 Calle Bueno Ganar is located literally by a couple pixels in the Very High Fire area. The High/Very High Fire Designation has resulted in my home insurance more than tripling in the past several years, and subsequently making a lot of insurance companies not available to our community. I believe that both my home and all of the neighborhood should be the same hazard level at least based on common characteristics, and should not be High but Moderate. See Map Below: I base my request on the following: Common development pattern in our neighborhood which include all irrigated, landscaped and cleared lots. Maintaining clear defensive space is of high priority in this community Historical fires in this area, where they originated, where they burned The change in development in this area which

has created more cleared open space, and more developed properties which serve as a fire break. Relatively flat topography, managed vegetation in the open space area, accessibility and distance from severe topography and dense natural vegetation. Our Neighborhood and many surrounding properties are connected to Otay Water District water San Diego County Fire Station 36 is located within ½ mile from the neighborhood. No high tension power lines thru this area, our electrical service is underground. Many areas of our neighborhood and the surrounding area I am speaking to in Jamul have not burned at all, and the last fire that passed to the South of the Neighborhood was in 2007 as mapped in the California Fire Perimeters. In the below composite Map I labeled the name and year of the Fire Perimeter: This neighborhood has not had a fire in it since the Laguna Fire in 1970 based on California Fire Perimeters mapped as indicated in the below map. At the time of this fire, this area was not developed. The Proctor Valley Estates Neighborhood began development in 1990. In the years I have lived here, there has not been one fire that has come close to our home that required evacuation. Prior FHSZ maps had a large portion of the area surrounding our neighborhood as Moderate and the area of our neighborhood designated as High. I am not sure when the designations changed to be High and Very High, but it is not consistent with the originations of fires, the burn patterns and current condition of the neighborhood and surrounding area. In addition, as already indicated, large areas have never even burned, or have not burned in decades, including our neighborhood that last burned in 1970. There has been significant clearing on the properties located to the East of our neighborhood, in addition to the construction of the Jamul Indian Casino immediately Southeast of our neighborhood and the new construction of the relocated Fire Station. The buildings replaced native vegetation and are now concrete construction which creates a fire break where one had not been previously. In addition, large swaths of land South, West and East of the Fire Station and Casino have been cleared and graded for new development. Furthermore, acres of the national wildlife refuge are kept cleared and cut short, leaving only the larger trees in the area East of the Casino providing another area where fires can be slowed. See the below aerial photos: The majority of fires in the Jamul zip code have originated many miles East of the neighborhood we live in and burn thru canyons and hills with large amounts of untended scrub brush and grasses. The topography of our neighborhood is flat. The area just East of us is low sloping hills with a great distance of line of sight. This area is also largely cleared. I don't believe that this area should be designated High or Very High, but designated Moderate because the majority of land is cleared or developed with homes, casino or businesses and are landscaped and irrigated and serve as a fire break not a fire threat. The Steel Canyon Golf Course community is designated Moderate and High risk in the Proposed Updated June 15, 2023 FHSZ map and it is surrounded by steep mountains without access that are covered with unmanaged brush and also have high tension power lines running thru. In contrast to our neighborhood and the surrounding area which is largely flat, and is accessible and almost entirely developed or has cleared open space with only small patches of natural scrub brush in areas that are accessible. In Summary, I believe that my home 13956 Calle Bueno Ganar, my neighborhood and the surrounding community should be redesignated Moderate Fire Hazard which reflects the historical fire risk, and the current development pattern which further reduces risk of fire. The Current and Proposed Fire Hazard designations that have been placed on our homes cost us greatly and it is not fair to us. Thank you so your consideration and review of this letter. Sincerely, Jazmin Hinojosa
Jazmin_Cebreros@yahoo.com

Response: No changes were made to the regulation in response to this comment. The area is Very High in the previous map, not High as the comment suggests, although there was some

Moderate nearby that is now Very High. The abundance of nearby fire history and fuels does not seem to warrant a downgrade in FHSZ in this area. While the nearby Steelhead Golf Course community has Very High hazard adjacent to it, the width of the buffered area inside the VH is 600 m in Steelhead compared to 400 m in Jamul, which results in a lower hazard zone in the interior.

ID 1406, Comment: The Ewiiapaayp Band of Kumeyaay Indians (EBKI) has reviewed the draft Fire Hazard Severity Zones (FHSZ) Map. The FHSZ depicts a “Very High” SRA for the Ewiiapaayp Indian Reservation that appears to be about 20 acres in area. Please see attached screenshot of the FHSZ map with the Ewiiapaayp Indian Reservation in the center and the FHSZ SRA with a marker placed at Longitude-116.3789, Latitude32.8361. The Ewiiapaayp Indian Reservation is 5,460.13 acres in total in this area. EBKI is concerned that only about 20 acres are marked for Fire Hazard Severity Zone Very High, while the remaining 5,440.13 acres are not Very High, High, or even Moderate Fire Hazard Severity Zone. Please note the fee properties in Thunder Valley contiguous to the southwest boundary of the Reservation (Thunder Valley LLC, Thunder Valley LL1, Filippone & Christina Salvatore, Nodzak Survivors Living Trust, Joint Estate of William Curran, etc.), and the Thing Valley Ranch properties (7 Time Properties LLC) contiguous to the south boundary of the Reservation, are depicted with a Fire Hazard Severity of Very High for all of these fee properties. EBKI cannot apprehend the rationale for designating as a Very High Fire Severity Zone only 0.0036% of the Ewiiapaayp Indian Reservation while designating 100% of contiguous fee properties as Very High Fire Severity Zone. Please record EBKI’s objection to the designation of such a small area of the Reservation as a Fire Hazard Severity Zone of Very High. We request an explanation and a remedy for this question. Thank you. Will Micklin, CEO Ewiiapaayp Band of Kumeyaay Indians 4054 Willows Rd Alpine, CA 91901-1620 Email: ceo@ebki-nsn.gov Tel: (619) 368-4382

Response: No changes were made to the regulation in response to this comment. The area not shown as VH is in FRA where FHSZ are not required. If zoning were required on the rest of the reservation, it would also fall in the Very High hazard class according to the statewide FHSZ model.

ID 3452, Comment: August 9, 2023 VIA U.S. MAIL AND E-MAIL

(fhszcomments@fire.ca.gov) Office of the State Fire Marshal c/o: FHSZ Comments California Department of Forestry and Fire Protection P.O. Box 944246 Sacramento, CA 94244-2460 Reference: Draft Fire Hazard Severity Zone Maps (Updated June 15, 2023) Subject: Rancho Mission Viejo Comments Greetings, Chief Berlant: Rancho Mission Viejo, LLC (“RMV”) has reviewed the updated Draft Fire Hazard Severity Zone Maps prepared by the California Department of Forestry and Fire Protection (“CAL FIRE”) dated June 15, 2023 (the “Second Draft FHSZ Maps”). The following letter presents RMV’s comments in relation to the Second Draft FHSZ Maps. At the outset, RMV would like to thank CAL FIRE for its courtesy in considering the comments previously prepared and presented by RMV in relation to the initial Draft Fire Hazard Severity Zone Maps published by CAL FIRE on or about November 21, 2022 (the “Initial Draft FHSZ Maps”). Specifically, the Second Draft FHSZ Maps reflect several modifications that are directly responsive to questions and concerns raised by RMV in its April 3, 2023 comment letter relative to the Initial Draft FHSZ Maps. RMV genuinely appreciates these revisions. Moreover, RMV appreciates the opportunity afforded by CAL FIRE to provide comments in relation to the Second Draft FHSZ Maps. Although the Second Draft FHSZ Maps

reflect clear improvement over the Initial Draft FHSZ Maps, RMV believes that further revisions to the Second Draft FHSZ Maps are warranted in order to ensure that the maps are accurate and reliable in relation to the Rancho Mission Viejo property (the “Ranch”). Those portions of the Second Draft FHSZ Maps that reflect inaccurate or incomplete information concerning the Ranch are addressed in Section I, below. Thereafter, RMV presents its specific requests for improving the Second Draft FHSZ Maps (Section II), followed by RMV’s concluding remarks (Section III).

I. Inaccurate / Incomplete Information Reflected in the Second Draft FHSZ Maps

A. Ranch Plan Overview. As a reminder from our April 3, 2023 comment letter, the entitlements for the Ranch (collectively known as the “Ranch Plan”) authorize development of six (6) individual “Planning Areas” that are located within the remaining Ranch acreage. The geographic bounds of the Ranch and the individual Ranch Plan Planning Areas are generally depicted in Figure 1 (see below). In our April 3, 2023 comment letter, we pointed out three (3) villages within the Ranch Plan community where (i) homes have been constructed and occupied and (ii) the Initial Draft FHSZ Maps fail to accurately account for said development and occupancy; namely: The Village of Sendero (aka “Planning Area 1”), the northerly phase of the Village of Esencia (aka “Planning Area 2”), and the developing phases of the Village of Rienda (aka “Planning Area 3”). Figure 1 (see below) depicts the locations of the individual villages / Planning Areas where construction and occupation have occurred. Notably, the Second Draft FHSZ Maps reflect changes in the fire zone designations for portions of the Ranch that correspond to the development and occupancy data previously shared by RMV in its April comment letter – to wit, the Second Draft FHSZ Maps now account for construction and occupancy within all of Planning Area 1 and much of the developed areas within Planning Area 3 (see Figure 2, below). Notwithstanding the foregoing revisions, the Second Draft FHSZ Maps continue to reflect inaccurate or incomplete data with respect to other portions of the Ranch which, in turn, results in improper fire zone designations for these areas. These areas are individually discussed and depicted in the following subsection.

B. Developed Portions of Ranch that Are Incorrectly Designated

1. Cow Camp Road and Los Patrones Parkway Adjacent to Village of Esencia (Planning Area 2) Cow Camp Road and Los Patrones Parkway are major arterial highways that are located, respectively, along the southerly and easterly edges of development in the Village of Esencia (Planning Area 2). The roadways/areas in question are depicted in Figure 3, below. These large, paved areas with significant manufactured slopes and irrigated landscaped areas should be designated as Non-Wildland (Urban). Notably, the Non-Wildland (Urban) designation is utilized for roadways in other areas, but not consistently. The yellow outline on the aerial photograph on the left of Figure 3 indicates an inconsistent and inaccurate depiction of the pavement, manufactured slope and non-combustible vegetation on the south side of Cow Camp Road (south side of Planning Area 2). As depicted on the current Google Earth exhibit that is reproduced on the right side of Figure 3, a wide swath of the green pattern designating “Other Non-Wildland (Agricultural, Water, Barren, Etc.)” should continue further to the east to meet up with the “Non-Wildland (Urban)” designated area that covers Cow Camp Road and the San Diego Gas & Electric substation on the side of Cow Camp Road (located at the southwest corner of Planning Area 2). In addition, Los Patrones Parkway along the easterly boundary of Planning Area 2 should also be designated by the green pattern designating “Other Non-Wildland (Agricultural, Water, Barren, Etc.)” in order to account for the pavement, manufactured slope and non-combustible vegetation comprising said right-of-way.

2. Westerly Portion of Village of Rienda (Planning Area 3) A graded and developed/landscaped portion of the Village of Rienda (Planning Area 3) is misclassified as Wildland. This area should

be redesignated as Non Wildland (Urban) (see Figure 4, below). 3. Orchards Adjacent to the Village of Rienda (Planning Area 3) By way of introduction, avocado and citrus orchards have proven to be excellent fire buffers in Orange County. There are many documented instances where a wildfire grinds to a halt within an orchard, with only heat damage to the fruit and no fire propagation within the orchard. In some areas of the state, orchards that are not well maintained may no longer be wildfire resistant; however, RMV is committed to the ongoing operation, maintenance and irrigation of its existing orchards. Of particular import, RMV has been actively cultivating its orchards for over 100 years. And, orchards on the Ranch have historically served as a buffer for wildland fire activity. RMV's orchards are planted and maintained uniformly throughout the Ranch. However, the fire hazard severity zone map designations of agricultural on the Ranch are not entirely consistent with the actual limits of the existing orchards on the Ranch. Notably, the orchards located adjacent to Planning Area 3 (see Figure 5, below) are not fully / accurately identified as "Non-Wildland (Urban):" To ensure consistency and accuracy, the Second Draft FHSZ Maps should be revisited and revised to ensure that existing orchards located northeast of Planning Area 3 are identified as "Non-Wildland (Urban)." It is also important to note that these specific orchards are within an area fully entitled for development. Construction is expected to begin within the next few months that will grade this site and remove all vegetation including a significant portion of these orchards. 4. Orchard Classification within the Village of Esencia (Planning Area 2) As an analog to the preceding subsection, the Second Draft FHSZ Maps classifies some orchard areas within Planning Area 2 as Non-Wildland, but said classification is neither complete nor uniform (see, e.g., Figure 6, below). The yellow outline on the aerial photograph that appears on the left of Figure 6 indicates an inconsistent and inaccurate designation of orchards along either side of Chiquita Canyon Drive on the west side of Planning Area 2. As depicted on the current Google Earth exhibit which appears on the right of Figure 6, the area in question is a uniformly maintained orchard. Accordingly, the Second Draft FHSZ Maps should be revised to identify the entire area in question as "Non-Wildland" – to wit, the area encircled on Figure 6 should be designated "Other Non-Wildland (Agricultural, Water, Barren, Etc.)" in order maintain consistency between the large green swath to the southwest and the "Non-Wildland (Urban)" designated area that covers all of the northern portion of Planning Area 2. In short: All existing / maintained orchards within the Ranch should be designated "Non-Wildland." 5. Northern Phase of the Village of Esencia (Planning Area 2) As originally discussed in our April 3, 2023 comment letter, the entire Village of Esencia (Planning Area 2) has been developed and is occupied by residents. However, the Second Draft FHSZ Maps continue to reflect incorrect information regarding the northerly phase of the Village of Esencia (the "Northern Phase"). Figure 7 (below) is a Google Earth aerial photo from August 2021 that focuses on the Northern Phase. As reflected in Figure 7, development of the Northern Phase is complete. Notably, since 2020, approximately 877 homes of all types (including affordable housing units) have been completed and occupied within the identified area. This entire area is constructed of ember and ignition resistant materials and, consequently, changes the nature of the fire hazard. RMV hereby renews its request that the Northern Phase be classified as "Non-Wildland" for purposes of determining the proper fire hazard severity zone designation for the subject land. Specifically, RMV respectfully requests that CAL FIRE remodel the Northern Phase as a Non- Wildland area, using criteria that recognize the urban / suburban nature of the developed area. As discussed in RMV's April 3, 2023 comment letter, RMV has previously modeled the Northern Phase based upon the area's developed state and has determined that, with implementation of approved fire resiliency strategies, characterization of the Northern Phase as a

very high fire hazard area is not appropriate. Were CAL FIRE to model the Northern Phase as Non-Wildland (ala urban / suburban community), RMV anticipates that CAL FIRE would arrive at the same conclusion as RMV - i.e., CAL FIRE's final fire hazard severity zone maps should be modified / corrected to remove the Northern Phase from the Very High Fire Hazard Severity Zone (with placement of said area into a zone that more accurately reflects the urbanized and developed nature of the property).

II. Requests of RMV

A. Redesignation of Urbanized Areas as Non-Wildlands; Remodeling of Areas. As per our April 3, 2023 comment letter, RMV continues to respectfully request that CAL FIRE (i) redesignate all urbanized and urbanizing villages within the Ranch Plan area as "Non-Wildland" areas rather than "Wildland" areas and (ii) remodel each of said Non-Wildland areas using criteria that recognize the developed / built-out nature of each area. As specifically noted in Section I.B.5, above, the Northern Phase of the Village of Esencia is completely built-out /urbanized. However, said area continues to be mistakenly characterized as "Wildland" which, in turn, leads to a modeling result that is inconsistent with / inapposite to existing conditions. Were CAL FIRE to: properly characterize all developed areas within the Ranch as "Non-Wildland" (said areas comprised of the Northern Phase, along with Planning Area 1, the balance of Planning Area 2 and the developed portion of Planning Area 3) and remodel these areas using Non-Wildland criteria RMV anticipates that the fire hazard severity zone designations for each area would change (see next subparagraph).

B. Revisions to Draft FHSZ Maps. Assuming CAL FIRE's acceptance / adoption of the revisions addressed in Section I.B, above, and in anticipation of CAL FIRE's remodeling of the developed portions of the Ranch as Non-Wildland areas, certain changes to CAL FIRE's fire hazard severity zone maps would appear to be in order. Notably (and specifically), the urbanized and developed portions of the Ranch (i.e., the Village of Sendero, the Northern Phase of Esencia and the Southern Portion of Rienda) should be regarded / addressed in a manner that is consistent with CAL FIRE's earlier treatment and classification of both Ladera Ranch and the southern portion of the Village of Esencia (again, fully-developed areas). As a result of our requested revisions, it is possible that some portion of the developed portions of the Ranch could be re-classified from high to moderate Fire Hazard Severity Zones.

C. Protocol for Future Map Revisions. As RMV continues to develop and implement the Ranch Plan over the next 20+ years, it is extremely important to ensure the FHSZ maps which pertain to the Ranch remain accurate at all times – not just at the five (5) and ten (10) year update intervals. As such, we respectfully request that CAL FIRE allow discrete, intermittent revisions to the FHSZ maps to reflect "as built" conditions based on new development. The California Building Industry Association ("CBIA") has developed a draft protocol for CAL FIRE's consideration in relation to the accomplishment of discrete map revisions (see instrument entitled "Proposed Hazard Map Revision Process," which is appended to that letter dated August 9, 2023 -- authored by CBIA and others – regarding "Comments on State Responsibility Area Fire Hazard Severity Zones, dated June 15, 2023"). RMV wholeheartedly supports and endorses the draft map revision protocol prepared by CBIA and appreciates CAL FIRE's courtesy in carefully evaluating the proposal.

III. Conclusion

Once again, thank you for allowing us the opportunity to review the Second Draft FHSZ Maps and to provide comments thereon. Should you and/or your team have any questions regarding the items addressed in this letter, we would be more than happy to schedule a conference call, teleconference or an in-person meeting to discuss any and all issues / items. Indeed, it is our sincere desire to ensure that CAL FIRE has all information necessary concerning the Ranch so that the final FHSZ maps are accurate and the best that they can possibly be. To that end, please feel free to contact the undersigned at any time if RMV can provide you and your team with any

additional information, clarifications or assistance. Sincerely, Mike Balsamo Senior Vice President – Governmental Relations Rancho Mission Viejo, LLC Encls. cc: Anthony R. Moiso, Rancho Mission Viejo Jeremy Laster, Rancho Mission Viejo Jay Bullock, Rancho Mission Viejo
Response: The areas that could be adjusted are very small, typically 1-2 pixel width changes - these adjustments will be made. North Esencia is already modeled as non-wildland, following an edit that was done after CAL FIRE unit review.

ID 604, Comment: Dear CalFie, The maps showing location of land relative to different fire hazard severity zones is incorrect for Cougar Lane, Santa Rosa, CA 95409. Our parcel has 4 different addresses for the same parcel with Sonoma County: 1910 Los Alamos Rd, 1910 Cougar Lane, 1980 Cougar Lane and 6500 Cougar Lane. Our parcel comprises 19.92 acres on Cougar Lane, with ~5 acres on the north side of Santa Rosa Creek, and ~15 acres on the south side of Santa Rosa Creek. We are in the burn scar of the 2020 Glass Fire. Your map shows the general correct bends in Cougar Lane, but is wrong in that it shows Cougar Lane crossing Santa Rosa Creek 6 times, when in reality it crosses only once, after the road starts to straighten, in a location that is even past where you show the 6th crossing. Your characterization of land as high or very high r hazard severity zone does not map correctly with the land and the creek. Everything on the North side of the creek is on a south facing slope, with vegetation including primarily California Live Oak and Oregon Oak. The vegetation on the south side of the creek is on a north facing slope, mainly with Douglas Fir. In the 202 Glass Fire, the Douglas Fire on the north facing slopes burned extensively and remains as charred dead trees. However, Many of the oaks on the south facing slope did not burn or die from the fire. Is the intent of your map that the north facing slopes on the south side of Santa Rosa Creek across Cougar Lane are classified as VHFHSZ, and the north facing slopes of Cougar Lane on the south side of Santa Rosa Creek are classified as HFHSZ? The map needs correcting to reflect that actual location for Cougar Lane relative to Santa Rosa Creek, and then that only the land on the south side of Santa Rosa creek is classified as VHFHSZ. Furthermore, in light that the Glass Fire removed the live Douglas Fire from the south side of Santa Rosa Creek, that area is now also much less flammable with no needles on the dead trees and the remaining tree stalks significantly thinned. Thus it would appear that this area should all be lowered in its current fire hazard severity rating. I am happy to discuss to clarify the correct depiction of the location of Cougar Lane relative to Santa Rosa Creek. Thank you. Deborah Eppstein, PhDdeppstein@gmail.com801-556-5004

Response: No changes were made to the regulation in response to this comment. The base map shown on the viewer with errors in the location of the creek crossing was not used in developing FHSZ. Zone boundaries are based on vegetation and slope transitions. The FHSZ boundary in this area matches our vegetation map, which shows some Douglas fir on the N side of the creek as well. The oak dominated areas are zoned as High and the conifer dominated areas are zoned as Very High. FHSZ takes a long view of vegetation potential so the recent fire does not indicate that hazard should be reduced in the conifer dominated area.

ID 2045, Comment: Sierra County Written Comment #1 March 21, 2023 Daniel Berlant Acting State Fire Marshal Attention: Fire Hazard Severity Zoning Comments 715 P Street, 9th Floor Sacramento, CA 95814 Dear Fire Marshal Berlant: The Sierra Count Fire Protection District #1 is responsible for structure protection in the Eastern part of Sierra County including properties in and out of the State Responsibility Area. As a vested partner in fire management in this part of the Sierra Nevada mountain range, our District is making comment on the FHSZ 2023

reclassification. Our District includes 514.9 square miles of Eastern Sierra County with a large variety of vegetation types from high elevation red fir and mountain hemlock to the dry sagebrush areas on the Sierra Front. The District has reviewed the classification changes from those on record from the 2007 review to the current 2023 draft classifications. Concern 1. Modeling Criteria: A portion of the town of Sierraville (Between 401 and 541 South Lincoln Street) and a small area in Sattley (even numbered properties between 150 and 156 Main Street) will shift from the 2007 'moderate' rating to the 2023 'Very High'. This shift must be a result of the modeling criteria that has been used for this process. That raises two areas of concern related to modeling and fuels assessment. a. Weather/Fuels Criteria: From a modeling perspective, we first question the validity of using the 95th percentile burning conditions as an acceptable tool for modeling spread from the wildlands into communities that are in the irrigated portion of Sierra Valley. For decades, fire behavior specialists have used the 90th or lower percentile criteria. There is a large difference between the consequences of using the different sets of variables. b. Spotting potential: In addition to the fairness question of using the 95th percentile criteria to show spotting distance into the communities of Sierraville and Sattley, the question of the fuel bed receptiveness near these homes needs attention. Most of the homes and the community church in the area under question are surrounded by large, manicured lawns kept green by weekly irrigation of premium quality natural valley soils. These lawns have been mowed weekly since the advent of power mowers. Some for longer periods. These irrigated and mowed lawns are NOT receptive fuel beds limiting the changes of ignition even under extreme conditions. These homes have gone through changes in ownership with higher interest in home pride of ownership reinforcing the irrigation/ mow behaviors-not the opposite. This classification process should reward that homeowner behavior, not penalize the property owner by an arbitrary use of extreme weather variables and false understanding of the receptiveness of the fuels near these homes. The Fire District and impacted property owners need to understand what purpose the use of these extreme criteria have to the value of protecting these homes in these small areas versus the consequences of leaving these homeowners with little chance of having sustainable insurance coverage. The District request re-consideration of those criteria coupled with re-consideration of the flammability (receptiveness) of the long established irrigated and mowed lawns that represent the fuel bed. Concern 2, Credit for Fuels Treatments: As a broader topic than those that are sight specific presented above, the Fire District believes that this planning process should consider the value of fuels treatment on both public and private properties adjacent our communities. The Fire District realize that these treatments will require maintenance support through time and believe that the technologies are available to the State of California to map both the treatments and maintenance of these areas allowing credit in the FHSZ displays.

Response: No changes were made to the regulation in response to this comment. The change in FHSZ here is due to a methods change to treat agricultural land the same as urban, and build FHSZs with a buffer routine that accounts for hazard originating in the adjacent wildland. CAL FIRE reviewed the zoning and underlying data in this area and determined that hazard was appropriately classified based on the vegetation composition and burn probability.

ID 432, Comment: I have reviewed your criteria for assessment of Hazard for Fire Zone in my home. The criteria are understandable as well as generally beyond my capacity to offer a detailed counter argument for my property to be assessed as Very High Fire Hazard Zones. Aside from being located on the edge of a ridge, as opposed to a more downward slope like my neighbors

who are assessed as High Risk, this assessment seems to not account for the fire behavior of the Nunn's fire in 2017. In our neighborhood area, having lived in Bennett Valley since 1997, and our current home on Bennett Ridge since 2006, our higher risk fire times with winds are in the fall and generally off-shore direction, such as the very high winds of the Nunn's fire. Our prevailing winds from the west/south west are on shore from the ocean, and are cooler and contain more humidity, especially fog. During the Nunn's Fire, the highest density of homes that survived the Nunn's Fire were along our section of the Ridge, where 4 homes in a row along the Ridge Line gratefully survived despite extreme fire conditions of high dry winds, flying embers with high winds (we evacuated with the fire within 100 + yards of our property) and no Fire fighting activity occurring at that time. Fire blocked our exit to the east. One of those High hazard (versus Very High Hazard) properties homes that did not burn is 75 yards from our home, and where the others similarly close are rated Very High. Most of the other homes within ¼ mile rated as High Hazard were burned in the Nunn's fire and are now gratefully rebuilt. One factor not seen in this assessment is the density trees (less in our section) and more defensible space, as well as the large Vineyard property bordering these properties to the west. Vineyards did burn, but not similar to grass or trees. Despite being on the ridge edge with possible exposure to slope risks and wind did not appear to play as significant of a role in the most significant fire during the period of 30 years noted in your assessment. My main concern, addressed in your information, is that despite the reassurances provided the Hazard assessment will effect Insurance as well as home values. Our neighbors do what is within their power to reduce risk, mitigations such as removing brush and trimming weeds, limbing up trees, having hardscapes. My hope is that our situation would be reconsidered as an exception to the designation of Very High Hazard Risk. Thank you. Respectfully, John F Mackey 2540 Bennett Ridge Road Santa Rosa, CA 95404 Sent from Mail for Windows.

Response: No changes were made to the regulation in response to this comment. The climate data does include the coastal influence, resulting in reduced estimates of fire intensity in this area. Recent fires (through 2020) do factor into burn probability in the model, as they reflect trends in fire likelihood within similar climate and fuel groupings. Like other temporary mitigations such as fuel treatments, the effect of wildfires on fuel loads is limited due to vegetation regrowth or type conversion. Because some of the most critical fire safety regulations involve construction materials and methods, which are influential over the entire life of a structure, FHSZ utilizes fuel conditions that reflect the maximal hazard condition likely to occur over a 30-50 year time horizon. Recent wildfires have resulted in damage and structure loss to within agricultural areas. The main mechanism of hazard in these areas is ember transport from adjacent wildland, but many agriculturally managed lands (vineyards, orchards, grazing, and other types), do contain modest fine fuels allowing for spread. The fire prevention regulations that go with FHSZ zoning are appropriate to mitigate fire risk in these lands where adjacent wildlands produce firebrands capable of vectoring fire into them.

ID 2266, Comment: Mr. Witt, The attached PDF contains my comments with maps. I'm also pasting my comments below in case the attachment is problematic. Thank you! -- Mark Pedroiamark.pedroia@gmail.com Mark Pedroia PO Box 1000 Guerneville, CA 95446-1000 mark.pedroia@gmail.com 707-544-6258 April 3, 2023 California Department of Forestry and Fire Protection Office of the State Fire Marshal C/O: Scott Witt via fhsczcomments@fire.ca.gov California Natural Resources Building 715 P Street, 9th floor Sacramento, CA 95818 Dear Mr. Witt, I am writing to provide comment and concern on the

proposed revisions to the FHSZ maps surrounding the town of Guerneville in unincorporated Sonoma County. Traditionally, the Guerneville downtown commercial area, Armstrong Valley floor and lower areas surrounding the Russian River waterway have been classified as moderate hazard. The revised map upgrades all these areas to high. I compared the before/after using the viewer and determined our reclassification and it is a blanket replacement of classification. It is difficult to accept that each of these areas is high given the absence of terrain or heavy fuels. In particular, the reclassification of the Armstrong Valley floor from moderate to high is surprising. An even more surprising outcome of the draft map is the downgrade of Armstrong Redwoods State Natural Reserve from high to moderate. The park is at the tip of the valley, consisting of steep terrain and heavy fuels. There has been historic fire activity in the park and again most recently as demonstrated during the Kincade Fire (Sonoma County Oct 2019) when the fire burned down to, and stopped at, the valley floor. The natural conditions of the park are easy to identify as an increased hazard but the opposite is being proposed which seems backwards. In northern Sonoma County, the southern end of the town of Cloverdale has been upgraded from moderate bypassing high and landing at very high. This area encompasses undeveloped land with light grasses and valley oaks until it connects to a flat commercial/industrial area to include a 100k ft² concrete wine warehouse adjoining Hwy 101. It does not, at all, resemble the slope, terrain, aspect, or fuel-loading, etc. of other areas given a very high designation. Seeing three different determinations which appear to be the reverse of what would be expected has caused me to write and to question these outcomes. Given that changes to the state's fire hazard zones will have major impacts on local land use policies, wildfire management and insurance underwriting, I believe the Guerneville downtown core and Armstrong Valley floor areas are deserving of a second look. Respectfully, Mark Pedroia Guerneville, CA Enc: Maps

Response: No changes were made to the regulation in response to this comment. The different zoning in Armstrong Valley is because the new map treats agricultural areas as non-wildland, and scores them with a buffer routine that is based on the hazard originating in the adjacent wildland. We made this change because structure damage driven by fire brands in agricultural areas such as vineyards has occurred in recent fires. Armstrong Redwoods Reserve is dominated by Redwood, which has lower estimated hazard than some of the vegetation in surrounding areas, especially Montane Hardwood Conifer. CAL FIRE reviewed the zoning and underlying data in and around Guerneville and Cloverdale and determined that hazard was appropriately classified based on the vegetation composition and burn probability.

ID 2256, Comment: March 28, 2023 Office of the State Fire Marshal c/o FHSZ Comments California Department of Forestry and Fire Protection PO Box 944246 Sacramento, CA 94244-2460 ATTN: Scott Witt, Deputy Chief RE: Proposed Fire Hazard Severity Zones, 2022 Dear Deputy Chief Witt: The County of Colusa participated in the public hearing held on January 3, 2023 in Stonyford, California; however, has chosen to provide our comments in writing. They are as follows: 1) The format for your public hearings did not lend itself to informed participation by the people the hearings are designed to solicit feedback from. At the outset of the meeting, attendees were told staff would not be able to answer any questions, or provide information until the public hearing was closed, and that then there would be a questions and answer session. If this is the format Cal fire choses to use in the future, then there should be informational meetings held prior to the statutorily required public hearing. This gives the citizen an opportunity to ask questions and receive information, which they can then utilize to formulate their comments for the project. 2) There are many oversights with regards to the designation of

the Fire Hazard Severity Zones, hereinafter referred to as FHSZ: a) The modeling does not reflect the current fire hazard severity for fuel loading and other relevant factors present as specified in Public Resources Code section 4201 and 4202. In reviewing PRC section 4204. 1a (1) mitigation factors were obviously not considered, i.e., the large fire "moonscape" over a vast area of western Colusa County created by recent fires. Because of the total lack of vegetation and resultant fuel load for the next 20 to 30 years, much of this area will pose no fire risk regardless of other fire conditions. In section 4204 a rough parameter timeframe should be considered for the "periodical review." This would enable agencies at all levels, as well as land owners and managers to be more informed on "current" conditions on the landscape. b) Utilizing extreme fire weather when modeling, rather than typical fire weather, leads to elevated severity which should not be the emphasis of the study. In addition, the modeling needs to take into account changes to fire suppression tactics that are occurring and will continue to occur in the future. 3) As for the Summary of Effect in the NOPA, page 11 of 14, improperly designating zones more severely can have high impacts on residents within our county and that is not the type of governance and oversight they deserve. Private inholdings within the Mendocino National Forest located in the State Responsibility Area should not be included in this mapping, as the State has proven time and time again to not be responsive to those areas in the past, and there is no expectation that will change in the future. In addition, the model should clearly identify how the different fire suppression tactics that are occurring on Federal lands and on lands under the State's responsibility have been incorporated into the projections. 4) There is a need for more effective collaboration between State, Federal and Local Agencies on large scale fuel management/modification projects and goals. We thank you for the opportunity to provide comments on the most recent mapping effort.

Response: CAL FIRE validated our choice for threshold weather observations by checking against the weather that occurred during damaging fires. Risk mitigation is not included because the map is intended to inform where these activities should occur, not whether or not they have occurred.

ID 936, Comment: January 31, 2023 CALIFORNIA DEPARTMENT OF FORESTRY Office of the State Fire Marshal Attn: FHSZ Comments DELIVERIED VIA EMAIL Dear Gentlepersons, We commend the Department of Forestry for their efforts to update the FHSZ maps in State Responsibility Area. As a fire district which encompasses portions of both SRA, LRA, and FRA, we are providing comments based on the proposed ratings in our area. Specific Comments: 1) The area in and around the Fall River Golf Course, is shown as "Very High". This seems unreasonably high, as this is a moderate density residential development, which is surrounded by irrigated golf course. FIGURE 1 2) The area of Fall River Mills, south of Bridge St is also shown as "Very High". This seems unreasonably high, as this is a moderate density residential area and many of the buildings in this area are physically located on the Fall River, and associated riparian vegetation. FIGURE 2 3) Between McArthur and Fall River Mills, east and south of Dee Knoch Road; some areas are shown in all three severity categories. In the case of the cluster of homes around the Dee Knoch, Jim Day intersection, the assignment of "Very High" seems unreasonable, as the area is surrounded by irrigated fields on three sides, and fairly light fuels to the south/southeast. Perhaps more striking, there are irrigated fields which are classified as "Very High" and "High" to the east of this area. In general, the classification of those irrigated fields as SRA seems to be an error, and they should be considered for inclusion with the adjacent LRA. FIGURES 3 and 4 4) At the Pittville Road and Old Hwy Road Intersection, irrigated fields

located in LRA meet SRA lands classified as “Very High”. It would seem appropriate to have a more stepped transition here, perhaps including some moderate and/or high severity ratings adjacent to the irrigated fields, instead of an abrupt transition to “Very High”. FIGURE 5 5) On Big Lake, the lake surface itself is show as SRA, with three different fire severity categories. This seems to be a misclassification of SRA, as it is a lake with zero probability of burning, but it is perhaps equally perplexing that it would have three different severity ratings. Some of this could possibly be explained by portions of the lake being State owned, but that would not explain the three different ratings, as well as the classification of the non-state-owned portions of the lake as SRA. FIGURE 6 General Comments: 1) It appears that several of the anomalies/discrepancies are due to misclassification of SRA lands (which may have been developed from wildlands to irrigated lands since their initial classification). 2) The abrupt transition from presumably low to moderate fire severity LRA lands (some of which are irrigated fields) directly to very high severity SRA lands seems unreasonable; we believe a transition first to “moderate” and/or “high” first would be more appropriate in almost all cases. Thank you again for the opportunity to comment on this issue, and for working to update these maps. If you have any questions, please contact me via email at chief16@mcarthurfire.org.
Sincerely, Fall River Valley FPD

Response: No changes were made to the regulation in response to this comment. The Fall River Golf Course and nearby low-density residential areas are fairly continuous with the surrounding wildland fuels and therefore receive the same FHSZ designation as the surrounding wildland. The different zones in Big Lake and the High and Very High hazard zones in irrigated fields in this area are due to the methods used to zone non-wildland. Agricultural areas and water bodies are zoned using a buffer routine that is based on the hazard originating in the adjacent wildland, with higher hazard closer to the wildland. These methods were used to account for potential threat of embers to buildings in agricultural areas, on docks and house boats, as well as variation in reservoir height that occurs with drought. The LRA areas adjacent to SRA don’t represent an abrupt change in hazard class, but rather the boundary between SRA and LRA. LRA will be zoned into FHSZ, but the hazard classification in LRA is not included in the current regulation for SRA (i.e., LRA areas are not shown on maps/viewer during the SRA public comment process). We will be addressing any localized consistency and accuracy issues of the Fall River Mills LRA area during local review, which will allow for comments and suggestions for map changes.

ID 557, Comment: Dear Cal Fire: I object to my 5-acre parcel at 4953 Sonoma Mountain Road, Santa Rosa, being reclassified to the Very High Hazard Severity Zone. I acknowledge that this assessment does not consider fuel mitigation efforts or home hardening. The designation for 4953 Sonoma Mountain Road seems arbitrary. I am bordered or three sides by properties designated to be Moderate Hazard Severity Zone. Some of those moderate areas burned during the 2017 fires while my property did not. Much of my property is open fields/grasslands, precisely the nearby habitat that you deem to be moderate. The remainder of my proerpty is oak trees, mostly coast live oak and Oregon white oak. Your model fails to differentiate between oaks and conifers. I have a masters in biology from Humboldt State University and am very familiar with the characteristics of these trees. Oaks are MUCH LESS COMBUSTIBLE than conifers and present far less risk. This may be an overall modelling issue, but it affects my parcel greatly. A strip of nearby property along the South Fork of Matanzas Creek is designated to be Very High Hazard Severity Zone. This makes little sense because that area remains relatively wet even

during the hottest times of the year, and the trees adjacent to the stream are very unlikely to burn. I suspect that including the strip of land along the South Fork of Matanzas Creek is a major factor in the erroneous classification of my parcel. Excluding the South Fork of Matanzas Creek, the area including my property would likely be an “island” under 200 acres and ineligible to be included in a Very High Hazard Severity Zone under your criteria. Please revise the classification of my property and those of my immediate neighbors from Very High Hazard Severity Zone to High Hazard Severity Zone or Moderate Hazard Severity Zone. Thank you. Craig S. Harrison 4953 Sonoma Mountain Road Santa Rosa, CA 95404707-573-9990 <https://www.craigsharrison.net/>

Response: CAL FIRE adjusted FHSZ in this area to account for the surrounding low burn probability and moderate hazard. The FHSZ model does differentiate between oaks and conifers, but the conifer dominated areas in the vicinity are too small to be their own polygon and therefore get included along with the predominant Montane Hardwood and grassland in this polygon and contributed to the overall higher score.

ID 821, Comment: Memo to: Cal Fire at FHSZcomments@fire.ca.gov. From: Scott Sibbald and April Chapman, 4202 Burnham Ct. Santa Rosa, CA. 95404 Subject: Fire Hazard Severity Zone Map Date: January 25, 2023 As a homeowner at 4202 Burnham Ct., Santa Rosa, CA 95404, I am concerned about your proposed Fire Hazard Severity Zone Map where you are proposing that my address and the entire 320 acres of Summit View Ranch be included in the Very High Hazard Severity Zone (Red). The reason for my concern is that this change could negatively impact many aspects of my home ownership including property valuation, ability to sell my property, and cost of property insurance. I understand that your maps evaluate “Hazards” based upon the physical conditions that create the likelihood of fire behavior over a 30–50-year period, which you have summarized as the “likelihood of a damaging event”. I have reviewed the Sonoma County Hazard Mitigation Plan and confirmed that back to 1939 there has not been any wildland fire on the Summit View Ranch or even close to our property. (Refer Figure 8.9 Historic Fires). I have personally resided on Summit View Ranch for the past 40 year with a first-hand knowledge and history of the “physical conditions” of the property such as frequent fog layers, wind patterns and humidity levels. I have also reviewed the California OES web site <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fmyhazards.caloes.ca.gov%2F&data=05%7C01%7CFHSZcomments%40fire.ca.gov%7Ced5fe98c0421415fd4c908db031ab2%7C447a4ca05405454dad68c98a520261f8%7C1%7C0%7C638107185551987745%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=qnlWWItt5xmBCEhOUjvbk%2BGHaxL9%2BTyPCRk75AiRoIE%3D&reserved=0> The Fire Hazard Severity map shows the Summit View Ranch is in the moderate (yellow) and high (orange) rating, not the very high rating (red). I would like to know the exact “physical conditions” and methodology Cal Fire is using to determine the proposed “Very High Hazard Severity” rating. I am also curious as to why two State agencies would have different ratings for the same property. The Summit View Homeowners Association will be addressing all the history of Fire and disaster mitigation effort completed by homeowners in a separate correspondence. I appreciate your holding public hearings on this subject, which our HOA participated in, and in your commitment to responding to our questions. Scott Sibbald April Chapman

Response: Due to the surrounding low burn probability and the surrounding moderate hazard in the area CAL FIRE reclassified FHSZ to High. The FHSZ model does not account for fuel

reduction efforts or fire suppression resources. The climate data does include the coastal influence, resulting in reduced estimates of fire intensity in this area. The very high hazard rating in this zone is a result of much of the vegetation (particularly to the N and E of the ranch) being classified as Montane Hardwood, and most of the area having a steep slope.

ID 2271, Comment: April 2, 2023 Office of the State Fire Marshal California Department of Forestry and Fire Protection P. O. Box 944246 Sacramento, CA 94244-2460 Attn: Scott Witt, Deputy Chief RE: FIRE HAZARD SEVERITY MAPS The Ramona West End Fire Safe Council (RWEFSC) disagrees that the entirety of Ramona be identified as being a Very High Fire Hazard Severity Zone on the new State Fire Marshal's fire hazard severity maps. The Town Center of Ramona and immediate surrounding areas are not a Very High Fire Severity Zone as is demonstrated in the attached fire history maps, which go back to 1910 and up to 2022. Although fires have burned around the Town Center and surrounding areas, the maps show no history of fires burning in and around the Town Center. We ask that you reconsider showing all of Ramona as a Very High Fire Hazard Severity Zone on the State Fire Marshal's fire hazard severity maps. One of the ramifications to Ramona residents in living in what is shown as a Very High Fire Hazard Severity Zone is it affects their ability to buy homeowners insurance. New builders will have more requirements for getting their projects to completion. In addition to the Town Center of Ramona and surrounding areas not having any history of fire, Ramona does have resources to fight fires and pre fire planning is done. There are three fuelbreaks completed and maintained by CAL FIRE and the USFS. Two of these fuelbreaks are just east of the San Diego Country Estates, which borders the Cleveland National Forest. One is on the North side of Ramona. A 2-1/2 mile fuelbreak is on the west side of Ramona. Ramona also has an aerial attack base that both CAL FIRE and the USFS operate out of. There are numerous lakes and reservoirs that can be drawn from by helicopters during a fire. Ramona has 9 fire stations operating in Ramona – one in the Town Center, one just outside of the Town Center and one at the San Diego Country Estates. There are two more fire stations operated by the San Diego County Fire Protection District in Ramona, two CAL FIRE stations in Ramona, and two USFS fire stations. The Ramona Municipal Water District have improved their facilities since the 2007 Witch Creek fire to insure that they continue to function during events relating to fire. Fire Hazard Severity Maps Access in the Town Center and surrounding areas is good for fire personnel when responding to fires in the Town Center and surrounding area, and there is little chance that firefighters would not respond due to the possibility of getting trapped, and overcome by flames from burning vegetation. Please reconsider placing all of Ramona in the Very High Fire Hazard Severity Zone on the new State Fire Marshal's fire hazard severity maps. Thank you for your consideration, Kristi Mansolf, President Ramona West End Fire Safe Council

Response: No changes were made to the regulation in response to this comment. The majority of Ramona is incorporated and will be zoned in LRA; the SRA surrounding the town center includes Moderate, High and Very High Zones consistent with the FHSZ model and local conditions.

ID 1516, Comment: Greetings, I would like clarification on the zones established for my Verdi, Ca neighborhood. I serve as a Director for the Sierra County Fire Protection District where the new Hazard Severity Zones were introduced at our January meeting. Of note, we survived the 7,000 + acre Crystal Peak Fire in August 1994 and all too personally understand the hazards of the rural/urban interface. The zones make sense for wildfire management. I've attached a satellite

view of the neighborhood in question, bordering the CA/NV state line just northeast of Lake Tahoe. Having read the factors predicated zone classifications, I questioned the inclusion of a significant portion of Verdi-Sierra Pines in the highest risk category - while moving adjacent heavily forested areas to a moderate risk designation. You'll note the satellite imagery shows large sections north and west of Pinecone Drive, Verdi, CA to be relatively free from timber. In addition, given the damage from the Crystal Peak Fire, the hills are sadly denuded of mature growth, especially in areas where backfires were lit. Strangely, the heavily forested areas along the two creek beds of Sunrise and South Dog Creek (heavy fuel, no history of fire, easily conducive to blowing embers, same weather and terrain) are labeled as moderate. This makes no sense to me; please share your rationale for my better understanding. I understand you create 20 acre parcels, maybe that's why our home at 800 Pine Cone Drive is included in the highest risk zone when it's completely surrounded by open space for the most part. Zones extending to our northwest are likewise situated, with some beneath rock cliffs. Thank you, Candace Hunter

Response: No changes were made to the regulation in response to this comment. The neighborhood referenced is in a small (26 acre) non-wildland polygon, which gets scored based on the hazard in the adjacent wildland. There is no Moderate FHSZ in the area, just High and Very High, including along Sunrise and South Dog Creeks. Two of the three wildland zones surrounding the neighborhood are High FHSZ, and the zone to the NW is Very High because it has a greater proportion of forest than the other two. This polygon results in a buffer of Very High FHSZ into the neighborhood.

ID 2155, Comment: March 31, 2023 Re. Fire Zone Mapping To Whom It May Concern: Brookfield Properties is involved with Altair, an approximate 200-acre property located south of Rancho California and west of Pujol Street in the City of Temecula. We are concerned that the fire map (below) appears to suggest that some of our property is in, or adjacent to, a very high fire risk area. This information may not benefit from knowing that our approved project will become an urbanized residential area. Also, the interface between our project and wildland to the west will include both brush management and a four-lane arterial highway providing a fire break. Therefore, we would like to see a process and timing for map updates such as this Best regards, BROOKFIELD HOMES SOUTHERN CALIFORNIA LLC Tony Pauker tony.pauker@brookfieldpropertiesdevelopment.com 619-247-3720

Response: No changes were made to the regulation in response to this comment. The proposed regulation only designates Fire Hazard Severity Zones in the State responsibility Area. Once the regulation is effective, the identification process for the Local Responsibility Area will occur.

ID 1509, Comment: Hello, In reviewing the proposed 2022 Fire Map I notice a significant error along the South side of Putah Creek West of Winters. (Unincorporated Solano County). The map lists the road following the creek as Quail Canyon Rd. This is incorrect as this road is Putah Creek Rd. Quail Canyon Rd is located Northwest of Pleasants Valley Rd. The significance is that a recent fire started on Quail Canyon Rd, increasing the risk of that area. I am concerned that this is affecting a higher fire risk zone in our neighborhood. The area of Olive School Lane is different than the area of Quail Canyon Rd. But may be affected by this map error. We live on a very small cul de sac in the Olive School area named Quail Lane, and are often confused with Quail Canyon Rd even though it is a distance to the West against the hills. Our home was built in the 1970s, and several existing homes in this area were original farms before the 1970s. The turn in Putah Creek has been a protective factor. I would appreciate confirmation that this error will

be reviewed and updated. Thank you, Dori Anderson
8505 Quail Lane Winters CA 95694
530-574-1097
Sent from my iPhone

Response: No changes were made to the regulation in response to this comment. The roads as shown are the product of our software's basemap – OSFM do not have control over them. Fire history is incorporated into the model though it is done through the actual location of the fire perimeter. The mislabeled road in this case does not affect the model output.

ID 3737 Comment: To: Damien Mavis, Covelop From: Dudek Fire Protection Planning Team; Michael Huff, Principal Fire Protection Planner & Matthew Crockett, Fire Protection Planner
Subject: Avila Beach Resort – Fire Hazard Severity Zone Classification Date: October 16, 2023
cc: Attachments N/A Figures 1-2 This letter is written in response to CAL FIRE's recently updated Fire Hazard Severity Map (09.29.23), which, compared to the prior map release (06.15.23), reclassified wildfire hazard within portions of the Avila beach Resort located in San Luis Obispo County. The Avila Beach Resort covers 169 acres and includes an 18-hole golf course with irrigated turf, driving range, and recreational and tourist facilities. Limited portions of the property remain in their natural state. As such, CAL FIRE has classified Avila Beach Resort as a non-wildland area. Dudek understands that FHSZs in non-Wildland areas are classified through a function of the adjacent wildland score, brand load, slope, and non-wildland tree cover. Non-wildland areas are subject to 20-acre. patch size minimum. However, there appears to be a clear deviation from this methodology when assessing the non-wildland FHSZ classifications within the Avila Beach Resort. As stated above, non-wildland zones are first classified according to the adjacent wildland zone classification. The extent of the adjacent wildland score into the non-wildland area is then determined through a function of brand load, slope, and tree cover. Given this methodology, it should not be possible for non-wildland classification to be higher than their adjacent wildland zone score. While Dudek recognizes that wildfire risk may be higher in non-wildlands due to conditions present in nearby wildlands and the corresponding threats to assets, it would be misleading to suggest that wildfire hazard (i.e. likelihood of fire and expected fire behavior) is higher in non-wildland areas compared to adjacent wildlands. This fact is further relevant when considering the conditions of non-wildlands at the Avila Beach Resort which resemble irrigated turf and maintained landscapes, both of which are not conducive to fire spread and intensity. However, the updated FHSZ mapping of the Avila Beach Resort suggests that large portions of the ownership's non-wildland areas are of higher wildfire hazard compared to their immediately adjacent wildland areas (See Figures 1- 2). Roughly 70 acres (~ 40 acres in the southeast region & ~ 30 acres in the northwest region) of non-wildland areas within the ownership appear to be mapped as VHFHSZs. These non-wildland areas border wildland areas designated as High FHSZs, and therefore should not be considered Very High Hazard. To remedy these concerns, Dudek suggests that CAL FIRE refine the boundaries of non-wildland zones within the Avila Beach Resort. Creating smaller non-wildland zone boundaries while retaining a minimum patch size of 20 acres will assist in mitigating the current concerns with the non-wildland FHSZ classifications. Doing so would allow non-wildland areas to be accurately classified according to the directly adjacent wildland score as defined in CAL FIRE's modelling methodology. It is our hope that these comments will provide a more detailed and accurate determination of FHSZs within the Avila Beach Resort.
Response: No changes were made to the regulation in response to this comment. The zoning within the golf course results from the model's output of FHSZ in non-wildland areas. The hazard characterization in non-wildlands reflects the dominant role of fire brands acting as

mechanisms of fire ignition and spread, while wildland areas reflect estimates of fire likelihood and intensity. The golf course is adjacent to both High and Very High hazard wildland, causing the golf course to be zoned partially as Very High. Fire winds as modeled in this area are very dominated (~96%) by northerly winds, causing a wide buffer in a southerly direction, due to the Very High hazard wildland to the North.

ID 1149, Comment: February 3, 2023 State Fire Hazard Severity Zones Please consider the following comments regarding the proposed rulemaking concerning the regulations relating to fire hazard severity zones in the State Responsibility Area. After reviewing the map entitled “State Responsibility Area Fire Hazard Severity Zones” for the Plumas County region a few areas caught my attention. 1) Mohawk Valley – The area encompasses the communities of Plumas Eureka, Mohawk, Blairsden, and Graeagle. The map shows a large area of “High” hazard zone that is fairly intricately cut out of the surrounding “Very High” zone. However, this seemingly intricate boundary does not correlate to any apparent change in actual, on-the-ground conditions that would influence fire hazard. The charming communities of Plumas Eureka and Graeagle are built right into a landscape dominated by long-needle pine dominated mixed conifer forest. During the Dixie and North Complex wildfires of 2021 and 2020 fire swept from wildlands through communities that were delineated by much more dramatic vegetation/fuel changes than in these communities. Elsewhere on this map, where no apparent vegetation type change exists between wildland and developed community there is no change in fire hazard severity rating. I believe that the forested areas in the Mohawk Valley should be included in the “Very High” hazard zone and the “High zones should be limited to the meadow areas only, as they are elsewhere on the map. (It is also odd that the large contiguous meadow system that is now Graeagle Meadows Golf Course is included in the “Very High” zone. It is likely “Moderate” if not fireproof). 2) The Eastern Escarpment – The area encompasses the landscape east of the hydrologic crest of the Sierra Nevada mountains down to the valley floors through which Highway 395 runs and includes the communities of Janesville, Milford, Doyle, Constantia, and Long Valley. The map shows a change in hazard zone from “very High” to “High” and “Moderate” in a couple of places that appears closely associated with the change in vegetation type from conifer forest to sage and grassland. However, this change in hazard zones does not appear to consider the historic fire behavior that occurs in this area caused by local weather phenomena that is well documented (including in a California Department Of Forestry training video that documents the horrifying events of the 1989 Eagle Fire burnover). The 2021 Beckwourth Complex also served as a vivid reminder of the expected fire behavior associated with local weather phenomena that generate rapid, high intensity down-slope fire runs with overwhelming spotting and violent vortices. The predictability of these conditions is high enough that this area should be considered a “very high” hazard zone from the Sierra Crest east, down to Highway 395 in most cases. There are other smaller areas of inconsistency such as a small portion of forested land on the western edge of Indian Valley, South of Greenville that is shown as “High” but probably should be “Very High”. Thank you for the opportunity to comment. Ryan Bauer 755 Jackson St. Quincy, CA 95971 rb13a@yahoo.com (530) 394-8007

Response: No changes were made to the regulation in response to this comment. CAL FIRE reviewed the zoning and underlying data in this area and determined that hazard was appropriately classified based on the vegetation composition, slope, and burn probability. This zone was distinguished from the surrounding forested area because the slope is less than 20%. In addition, the vegetation used in the model differs: within the polygon is Eastside Pine, and

outside is Sierran Mixed Conifer, which get assigned a moderate and very high fuel load, respectively. The golf course, along with the neighborhood to the SW are an urban polygon scored by buffer. While the golf course is unlikely to burn in its current state, if it were to be developed for residential use the houses should be built to a standard that accounts for the hazard from the adjacent Very High wildland. During zone formation this area was included along with the valley, and therefore gets a lower hazard when averaged over the entire zone.

ID 2649, Comment: March 28, 2023 Office of the State Fire Marshal California Department of Forestry and Fire Protection P.O. Box 944246 Sacramento, CA 94244-2460 Attn: Scott Witt, Deputy Chief c/o Daniel Berlant, Acting State Fire Marshal RE WESTRIDGE VALENCIA MASTER HOMEOWNERS ASSOCIATION -Public Comment Submission -Petition for Repeal of Proposed Regulations. -California Code of Regulations TITLE 14. Natural Resources DIVISION 1.5. Department of Forestry and Fire Protection CHAPTER 7. Fire Protection SUBCHAPTER 3. Fire Hazard ARTICLE 1. Fire Hazard Severity SECTION 1280.01. Fire Hazard Severity Zones in the SR. TITLE 19. Public Safety DIVISIO?? 1. State Fire Marshal CHAPTER 17. Fire Hazard Severity Zones, 2 Dear Mr. Witt: This firm serves as general legal counsel to Westridge Valencia Master Homeowners Association ("Association"). Please direct any correspondence to the undersigned at our Woodland Hills office. On behalf of the Association, our office would like to object to the proposed State Responsibility Area ("SRA") Fire Hazard Severity Zone ("FHSZ") drafted for Valencia, CA. This letter shall also constitute the Association's petition under California Government Code section 11340.6 requesting the Office of the State Fire Marshal repeal the proposed State Responsibility Area ("SRA") for the Fire Hazard Severity Zone ("FHSZ") for Valencia, CA and to eliminate the Association's community from being included in the proposed SRA. Specifically, the proposed FHSZ encompass the entirety of the properties located within the Association. The Association believes the State Fire Marshal's proposed SRA for the FHSZ in Valencia is overbroad and unduly burdensome to the Association and its property owners. If allowed to be adopted, the homeowners and the Association itself will be subject to unnecessary expenses that will desecrate mature, healthy landscaping. Moreover, the Association believes the State Fire Marshal's designation of the SRA for the FHSZ in Valencia does not take into consideration necessary factors that must be accounted for. Office of the State Fire Marshal California Department of Forestry and Fire Protection March 28, 2023 California Public Resources Code Section 4202 requires the State Fire Marshal to consider different factors when classifying SRAs for FHSZs, stating: "The State Fire Marshal shall classify lands within state responsibility areas into fire hazard severity zones. Each zone shall embrace relatively homogeneous lands and shall be based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have been identified by the department as a major cause of wildfire spread." Here, the classification of the Association's community into the SRA FHSZ along with nearby slopes is inconsistent with the requirement such zone will "embrace relatively homogenous lands", as the Association's community has been leveled to stand out from the natural siopes nearby. The land the Association's community is built on has been extensively modified and developed to render it distinct from the natural slopes where the Fire Marshal's proposed SRA FHSZ exists. To pair the Association's community with natural conditions completely distinct and different from what the Association has built goes against the requirement the. SRA FHSZs embrace relatively homogenous lands. Therefore, because the Association's land is not relatively homogenous with the land in the proposed SRA FHSZ, it should be removed from the Fire Marshal's proposed

SRA FHSZ. Next, the State Fire Marshal's assessment under California Public Resources Code Section 4202 does not take into account several relevant factors that affect the Association's risk of wildfire spread. These include the following 1. All homes constructed since 2000 have been built with closed eaves. 2. All homes within Westridge have concrete tile roofing. 3. No wood fencing is allowed anywhere in the community. 4. No wood siding has been used in any of the homes. 5. A large portion of this community is surrounded by fully irrigated golf course. 6. The Association manages and irrigates a large, landscaped area that serves as a buffer to all the homeowner properties within the Association. This buffer area is professionally managed by a landscaping company, landscaping committee, and an on-site management representative. 7. A fully irrigated and fully maintained Land Maintenance Area ("LMD") exists as a buffer between the Association's landscape buffer area and the natural slopes that is fully monitored by LA County and a directed landscape crew. All of these features included in the Association's community deter wildfire spread substantially, specifically, with the use of flame-retardant materials in construction of the homes, as well as multiple buffer zones that already exists, including the Association's fully irrigated golf course and landscape area, as well as the LA County LMD. These factors all weigh in favor of finding the Association's community remains safe from elevated wildfire risks. The multiple fully irrigated and maintained buffer zones between the Association and the natural slopes especially cuts against a finding by the State Fire Office of the State Fire Marshal California Department of Forestry and Fire Protection March 28, 2023 Marshal that sufficient fuel loading exists within the Association's property that would feed natural wildfires. Therefore, taking these factors into consideration, the State Fire Marshal must reevaluate its proposed SRA for Valencia's FHSZ. Should the State Fire Marshal's proposed SRA for FHSZ in Valencia be adopted as it currently stands, the Association and its homeowners will experience substantial hardships and expenses. Specifically, the Association's insurance policy premiums will increase significantly should its entire community be designated as a SRA in the FHSZ for Valencia. All over California, insurance premiums have increased substantially for association developments, which in part has been due to properties being designated as FHSZs. Many insurance companies are even dropping associations entirely because of adverse fire ratings. A property's fire rating entails vast and severe consequences, which makes it even more crucial for the State Fire Marshal to take all relevant factors into consideration to try and create the most accurate fire ratings possible for associations and communities. Moreover, should the current proposed SRA for FHSZ in Valencia be adopted, the Association and its homeowners will be required to conduct extensive brush clearance that will cause substantial damage to the natural landscape that has matured and endured for decades. This will directly cost the Association and its homeowners, as well as indirectly through impacts to property values and the Association's operating budget for the foreseeable future. For all these reasons, the Association protests to the State Fire Marshal's proposed SRA for the FHSZ for Valencia and requests repeal of this proposed SRA. with the Association's property removed from any proposed SRA the State Fire Marshal adopts for Valencia, CA. The Association now submits this appeal to the Office of the State Fire Marshal as allowed by California Public Resources Code Section 4204, which states: The State Fire Marshal shall periodically review zones designated and rated pursuant to this article and, as necessary, shall revise zones or their ratings or repeal the designation of zones. Any revision of a zone or its rating or any repeal of a zone shall conform to the requirements of Section 4203. In addition, the revision or repeal of a zone may be petitioned pursuant to Sections 11340.6 and 11340. 7 of the Government Code." California Public Resources Code Section 4204 allows the Office of the State Fire Marshal to receive petitions to revise or repeal a zone pursuant

to Sections 11340.6 and 11340.7 of the Government Code. This authority is the basis of the Association's appeal to the Office of the State Fire Marshal. Therefore, the Association expects written confirmation of receipt of its appeal to repeal the State Fire Marshal's proposed SRA for the FHSZ in Valencia that includes the Association's community in the proposed SRA within thirty (30) days of receipt of this letter. Office of the State Fire Marshal California Department of Forestry and Fire Protection March 28, 2023 Should the Association not receive a response to its petition to repeal the Office of the State Fire Marshal's proposed SRA for FHSZ in Valencia that includes the Association's community, the Association shall exercise all its available legal remedies against the Office of the State Fire Marshal. Nothing in this letter shall be construed as a waiver of the Association's rights and remedies, all of which are hereby expressly reserved.

Thank you for your attention to this matter. Very truly yours, BEAUMONT TASHJIAN

JEFFREY A. BEAUMONT, ESQ. JAB:km/vm cc: Board of Directors

Response: No changes were made to the regulation in response to this comment. Zones are designed to be relatively homogeneous but there can be adjacent zones that are distinct areas and are scored as separate zones but get the same FHSZ designation, for example non-wildland adjacent to wildland gets a buffer of the same FHSZ class as the adjacent wildland.

Comment(s): General Information & Questions Response

Overview: General Information & Questions Comments

Overview: General Information & Questions – The Office of the State Fire Marshal received 3 comments that asked what the difference was that went into the model of the approved 2007 and the draft 2022 maps. The comment ID's that relate to those comments are as followed below: [396, 585, 609].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. A 2 km grid of climate data covering the years 2003-2018 is being used in the update. The previous model used stock weather inputs across the state to calculate wildland fire intensity scores. The updated model will adjust fire intensity scores based on the most extreme fire weather at a given location, considering temperature, humidity, and wind speed. In addition, ember transport is being modeled based on local distributions of observed wind speed and direction values instead of using a generic buffer distance for urban areas adjacent to wildlands.

Overview: General Information & Questions – The Office of the State Fire Marshal received 7 comments that requested look at the surrounding area of Ojay. The comment ID's that relate to those comments are as followed below: [2338, 2339, 2341, 2342, 2343, 2345, 2348].

Response: No changes were made to the regulation in response to this comment. CAL FIRE reviewed the zoning and underlying data in this area and determined that hazard was appropriately classified based on the vegetation composition, slope, burn probability, and the dominant direction of fire winds modeled in this area.

Overview: General Information & Questions – The Office of the State Fire Marshal received 2 comments that requested a second look at the surrounding area of San Luis Obispo and use fire history. The comment ID's that relate to those comments are as followed: [1825, 2073].

Response: Fire history - FHSZ does not use fire history immediately within the area, it is calculated within areas of similar climate and vegetation type. This area is within inland valley burn probability strata with FR 90 for hardwood and 194 for herbaceous. There is also a small amount of chaparral burn probability, with FR 52. Vegetation in the area is an intermix, with some areas of embedded agriculture scored by buffer, but there does appear to be a fair amount of vineyard and orchard that is mischaracterized as annual grassland or pasture in fveg. Modeled flame lengths are generally 5.5-6 feet, but get bumped up a bit due to 95th percentile FFWI around 40. Winds - it isn't the predominant winds that impact FHSZ, but those that occur under the most extreme fire weather for a given location. At this location, the worst winds tend to be out of the NNW or WSW, in the 10-20 or 20-30 mph classes. FFWI would be above 40 when these winds occur so coastal influence may be negligible on these days. Terrain in the FHSZ model refers to slope steepness, which is variable in this area but tends to be over 20% with a fair amount over 40% slope.

Overview: General Information & Questions – The Office of the State Fire Marshal 6 received comments that asked why embers were part of the model and why non wild land adjacent zones receive the same zone classification as wildland. The comment ID's that relate to those comments are as followed below: [1798, 1812, 2953, 3160, 3162, 3473].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. In non-wildland areas, zone edges occur based on distance to the wildland edge. Because hazard in these areas is largely determined by incoming embers from adjacent wildland, urban areas that are similar in vegetation type and housing density may have a change in FHSZ class as the distance to the wildland edge increases. Areas immediately adjacent to wildland receive the same FHSZ score as that wildland where fire originates, and the model then produces lower scores as the distance to wildland edge increases. In wildland areas, zone edges are a result of the way zones are delineated. Specifically, zones represent areas of similar slope and fuel potential. Zone boundaries divide zones based on geographic and vegetation features that align with fire hazard potential; although, at a local scale, it may appear that the immediate area is similar on both sides of the edge. The class value within a zone is based on the average hazard score across the whole zone, so areas that are in the same zone but not immediately adjacent to a local area can have an influence on the final zone classification.

Overview: General Information & Questions – The Office of the State Fire Marshal 2 received comments that stated that insurance companies would use the updated maps as a way to raise insurance premiums and should people comply with AB 38 Defensible Space Inspections. The comment ID's that relate to those comments are as followed: [2230, 2716].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Insurance companies use risk models, which differ from hazard models, because they consider the susceptibility of a structure to damage from fire and other short-term factors that are not included in hazard modeling. It is unlikely that insurance risk models specifically call out CAL FIRE Fire Hazard Severity Zones as a factor, but much of the same data that is used in the fire hazard severity zone model are likely included in the insurance companies' risk models. However, insurance risk models incorporate many additional factors and

factors that change more frequently than those that CAL FIRE includes in its hazard mapping, which is built to remain steady for the next 10+ years. Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are to damage. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk. Firewise community activities are targeted at reducing the risk to communities from the associated hazard and are consequently almost always in communities that have FHSZ zones in them. Mitigations are important for reducing wildfire risk in hazardous areas. FHSZ is intended for long term planning purposes; it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. As FHSZ measured potential hazard, it serves as the basis for needing mitigations. Separate statutory mandates outside of the OSFM's regulatory scope require that all property in High or Very High FHSZs in the SRA comply with Civil Code 1102.6f, real estate disclosures Assembly Bill 38 (Wood, Chapter 391, Statutes of 2019). These disclosures are known as "AB 38 Defensible Space Inspections," and are not required for property in Moderate FHSZs in the SRA. As a result of the proposed regulations, the boundaries of Moderate, High, or Very High FHSZs in the SRA may shift, altering which properties are required to comply. However, every FHSZ in the SRA is already required to comply with the underlying defensible space requirements of AB 38 located in PRC Section 4291.

Overview: General Information & Questions – The Office of the State Fire Marshal received 4 comments that stated that the commenters wanted to associate themselves with the Valley Vineyard Form Letter. The comment ID's that relate to those comments are as followed below: [2001, 2005, 2040, 2074].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Commenter(s) would like to associate with ID 1909

Overview: General Information & Questions – The Office of the State Fire Marshal received 3 comments that stated that model should be updated based on future land development. The comment ID's that relate to those comments are as followed below: [603, 2232, 2329].

Response: No changes were made to the regulation in response to this comment. Project timelines may be uncertain and variable, therefore wildland areas targeted for development are not considered part of the non-wildland until construction has begun.

Overview: General Information & Questions – The Office of the State Fire Marshal received 7 comments that stated that they did not want to be in a zone, at all. The comment ID's that relate to those comments are as followed below: [244, 245, 903, 1813, 1858, 2375, 2664].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Public Resource Code 4202; The State Fire Marshal shall classify lands within state responsibility areas into fire hazard severity zones. Each zone shall embrace relatively homogeneous lands and shall be based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have been identified by the department as a major cause of wildfire spread. Government Code 51178; The State Fire Marshal shall identify areas in the state as moderate, high, and very high fire hazard severity zones based on consistent statewide criteria and based on the severity of fire hazard that is expected to prevail in those areas. Moderate, high, and very high fire hazard severity zones shall be based on fuel loading,

slope, fire weather, and other relevant factors including areas where winds have been identified by the Office of the State Fire Marshal as a major cause of wildfire spread.

Overview: General Information & Questions – The Office of the State Fire Marshal received 2 comments that stated the public should have been involved in the model creation. The comment ID's that relate to those comments are as followed: [1126, 2630].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Public Resources Code 4202 requires the State Fire Marshal to classify lands within state responsibility areas into fire hazard severity zones. Each zone shall embrace relatively homogeneous lands and shall be based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have been identified by the department as a major cause of wildfire spread. Public comment on the map was received under Public Resources Code 4203 which requires the State Fire Marshal to notify each County Board of Supervisors and hold a public hearing in each county with a Fire Hazard Severity Zone designation in the State Responsibility Area, with an additional public hearing added in Sacramento County. When the office of the State Fire Marshal provided public comment periods and extensions, all requirements of the Administrative Procedure Act (APA) were followed.

Overview: General Information & Questions – The Office of the State Fire Marshal received 3 comments that asked why the model did not include recent fires. The comment ID's that relate to those comments are as followed below: [1125, 2170, 2351].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Recent fires (through 2020) do factor into burn probability in the model, as they reflect trends in fire likelihood within similar climate and fuel groupings. Like other temporary mitigations such as fuel treatments, the effect of wildfires on fuel loads is limited due to vegetation regrowth or type conversion. Because some of the most critical fire safety regulations involve construction materials and methods, which are influential over the entire life of a structure, FHSZ utilizes fuel conditions that reflect the maximal hazard condition likely to occur over a 30-50 year time horizon.

Overview: General Information & Questions – The Office of the State Fire Marshal received 2 comments that asked what key elements went into the model that created the draft maps. The comment ID's that relate to those comments are as followed: [1508, 2368].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The fire hazard severity model for wildland fire has two key elements: probability of an area burning and expected fire behavior under extreme fuel and weather conditions. The zones reflect areas that have similar burn probabilities and fire behavior characteristics. The factors considered in determining fire hazard within wildland areas are fire history, flame length, terrain, local weather, and potential fuel over a 50-year period. Outside of wildlands, the model considers factors that might lead to buildings being threatened, including terrain, weather, urban vegetation cover, blowing embers, proximity to wildland, fire history, and fire hazard in nearby wildlands. FHSZs are not a structure loss model, as key information regarding structure ignition (such as roof type, etc.) is not included.

Overview: General Information & Questions – The Office of the State Fire Marshal received 4 comments that asked why the model gave the zone classification that has been assigned. The comment ID's that relate to those comments are as followed below: [117, 422, 424, 427].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The Fire Hazard Severity Zone (FHSZ) maps are developed using a science-based and field-tested model that assigns a hazard score based on the factors that influence fire likelihood and fire behavior. Many factors are considered such as fire history, existing and potential fuel (natural vegetation), predicted flame length, blowing embers, terrain, and typical fire weather for the area.

Overview: General Information & Questions – The Office of the State Fire Marshal received 2 comments that wanted the Office of the State Fire Marshal to hold additional public hearings in their respective counties. The comment ID's that relate to those comments are as followed: [1123, 2027].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The Office of the State Fire Marshal followed PRC 4203(b) which requires that a public hearing be held in each county with a designated Fire Hazard Severity Zone.

Overview: General Information & Questions – The Office of the State Fire Marshal received 2 comments asking for a way to compare the 2007 and 2022 maps. The comment ID's that relate to those comments are as followed: [873, 908].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The Office of the State Fire Marshal has provided an interactive map throughout the process called SRA FHSZ Rollout Application on our website at <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=8a08fca5c54f4e6987800f160e2cf9b2> This map allows the public to compare the most recent FHSZ map to the 2007 approved map.

Overview: General Information & Questions – The Office of the State Fire Marshal received 8 comments asking for access to the intermediate data sets. The comment ID's that relate to those comments are as followed below: [456, 874, 879, 919, 1436, 2305, 3151].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The Office of the State Fire Marshal posted for public review and comment detailed modeling methods and intermediate data sets during the June 26, 2023 and October 16, 2023 public comment periods.

Overview: General Information & Questions – The Office of the State Fire Marshal received 2 comments that are related to Los Angeles County Brush Clearance Tax. The comment ID's that relate to those comments are as followed: [1518, 1532].

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The proposed regulation only designates Fire Hazard Severity Zones (FHSZ) in the State Responsibility Area (SRA). Local ordinances and taxes are a function of the local jurisdiction, and the Office of the State Fire Marshal does not regulate local ordinances. Public Resources Code 4291 requires defensible space in Moderate, High, and Very High FHSZ in the SRA and Government Code 51182 requires defensible space in Very High FHSZ in the Local Responsibility Area (LRA). The FHSZ zones requiring defensible space in Los Angeles County are based off the 2007 adopted maps in the SRA and the regulation adopted by Los Angeles

County (LRA). The current FHSZ regulatory process does not have any effect on this comment as defensible space is required in all FHSZ zones in the SRA.

Overview: General Information & Questions – The Office of the State Fire Marshal received 6 comments that asked when Local Responsibility Area mapping would occur. The comment ID's that relate to those comments are as followed below: [1814, 1886, 2114, 2276, 2277, 2317].
Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The proposed regulation only designates Fire Hazard Severity Zones in the State responsibility Area. Once the regulation is effective, the identification process for the Local Responsibility Area will occur.

Overview: General Information & Questions – The Office of the State Fire Marshal received 2 comments that asked why Local Responsibility Area mapping was not on the draft maps. The comment ID's that relate to those comments are as followed: [2163, 3237].
Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The proposed regulation only designates Fire Hazard Severity Zones in the State Responsibility Area. Once the regulation is effective, the identification process for the Local Responsibility Area will occur. The Office of the State Fire Marshal has provided an interactive map throughout the process called SRA FHSZ Rollout Application on our website at <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=8a08fca5c54f4e6987800f160e2cf9b2>.

Overview: General Information & Questions – The Office of the State Fire Marshal received 4 comments asked how each county was notified for public hearings. The comment ID's that relate to those comments are as followed below: [580, 584, 687, 1393].
Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The State Fire Marshal notified each County Board of Supervisors and held a public hearing in each county with a Fire Hazard Severity Zone designation in the State Responsibility Area as required by Public Resources Code 4203. For all public comment periods and extensions, all requirements of the Administrative Procedure Act (APA) were followed.

Individual: General Information & Questions Comments

ID 730, Comment: Good morning, all. My name is Chris Wilson, senior policy manager with the Los Angeles County Business Federation. Biz Fed is a grassroots alliance of 215 diverse business groups mobilizing 410,000 employers with five million employees. We appreciate the opportunity to comment on the updated fire Hazard Severity zone maps when while we appreciate and agree with Cal Fire that a high-level wild hazard mapping is a valuable tool for all Californians, we wish to express. Our collective concern about the unreasonable short 45-day public comment period and the need for the agency to provide more information on its methodology and the key data sets in determining the significant mapping changes affecting almost 31 million acres of California and millions of California residents. We were asking for Cal Fire and the Office of State Fire Marshall to provide a reasonable extension of the of the public comment period of 60 additional days from the current February 3rd deadline. And for the

agency to provide the methodology along with an adequate summary of the variances between the 2007 and 2022 fire Hazard Severity Zone models, thank you so much. Appreciate it.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. A 2 km grid of climate data covering the years 2003-2018 is being used in the update. The previous model used stock weather inputs across the state to calculate wildland fire intensity scores. The updated model will adjust fire intensity scores based on the most extreme fire weather at a given location, considering temperature, humidity, and wind speed. In addition, ember transport is being modeled based on local distributions of observed wind speed and direction values instead of using a generic buffer distance for urban areas adjacent to wildlands. CAL FIRE used the best available science and data to develop, and field test a model that served as the basis of zone assignments. The model evaluated the probability of the area burning and potential fire behavior in the area. Many factors were included such as fire history, vegetation, flame length, blowing embers, proximity to wildland, terrain, and weather.

ID 414, Comment: The proposed revisions to the FHSZ maps propose a change from Moderate to High for the Viewpoint Rd, Aptos area. Viewpoint Rd is a Firewise Community bordered by the Forest of Nisene Marks State Park. My questions regard the criteria that resulted in the proposed change. -We understand that the hazard determination involves assessment of a number of factors. Has there been a change in the factors used in the hazard determination, e.g. new factors added or factor definitions revised? -Can you explain how the assessment of the various factors to produce a High hazard result is different from the earlier assessment that produced a Moderate hazard zone result? What changed? I look forward to your response. Thanks, Mike Sampson 7171 Viewpoint Rd, Aptos, CA 95003 msampson515@gmail.com

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. A 2 km grid of climate data covering the years 2003-2018 is being used in the update. The previous model used stock weather inputs across the state to calculate wildland fire intensity scores. The updated model will adjust fire intensity scores based on the most extreme fire weather at a given location, considering temperature, humidity, and wind speed. In addition, ember transport is being modeled based on local distributions of observed wind speed and direction values instead of using a generic buffer distance for urban areas adjacent to wildlands. Classification of a wildland zone as Moderate, High or Very High fire hazard is based on the average hazard across the area included in the zone, which have a minimum size of 200 acres. In wildlands, hazard is a function of modeled flame length under the worst conditions and annual burn probability. Both these factors generally increase with increasing hazard level, but there may be instances where one value is Very High and the other is low, pushing the overall hazard into a more intermediate ranking. On average, both modeled flame length and burn probability increase by roughly 40-60% between hazard classes. Classification outside of wildland areas is based on the fire hazard of the adjacent wildland and the probability of flames and embers threatening buildings.

ID 670 and 671, Comment: Title 19 Proposal needs Title, Purpose, and Scope Definitions not used in text should be eliminated If definitions apply to adopted map it should be clarified Appeals provision should be included to modify zone based actual observed conditions Provision to allow local jurisdictions to make fine scale adjustments to follow property lines, roads and topographic features.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Based on the way the model is run Statewide and affects both the SRA and LRA, an appeals process that attempts to update one development at a time is currently not feasible.

ID 534, Comment: FHSZSRA DRAFT 23 1 has an incorrect street address which could impact CalFire fighting fires in our area. We would not want to be missed because of a reference oversight. I understand that the ArcGIS map cannot be corrected by CalFire BUT please make sure that we are in CalFire's system for firefighters since ArcGIS is incongruent with what the address is locally. The correct address is 72049 E. Bank Rd, Blairsden, CA 96103 and we are miles away from Clio, CA 96106. All county records and deeds state the address as I have listed here but google maps spell it 'Eastbank'. When you are coordinating fighting a fire, you need accurate information that cross references correctly or else we are screwed due to our lack of connectivity by cell and landlines due to our remote location. Someone will think the map is wrong especially since our roads do not show up on google or Apple maps maps. We had a CalFire inspection done just 18 months ago and got a thumbs up but we are in the middle of 40 acres with Natl Forest on 3 sides. Unfortunately, our metal roofs on our two structures, each over 2300 SF, are green so they are not visible in satellite views and aerially because they blend in too well. REFERENCE these 2 links supplied by your severity map:<https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=4466cf1d2b9947bea1d4269997e86553#:~:text=72049%20Eastbank%20Rd%2C%20Clio%2C%20CA%2C%2096106%2C%20US> A and longitude & latitude <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=4466cf1d2b9947bea1d4269997e86553#:~:text=%2D120.581,39.7943> Thanks for the presentation in Plumas County and the video. Thanks for the work. We do what we can but still have our fingers crossed now from May to November. Mary Maggie

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The roads labels as shown are the product of our software's basemap – OSFM do not have control over them.

ID 3340, Comment: Hello - I have submitted my public comment and I am not getting confirmation back that it was received. Can you assist? Thank you Debra Gardner Sent from my Galaxy

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. All comments are collected, reviewed, summarized, and responded to in the final regulatory submission to the Office of Administrative Law.

ID 417, Comment: We reside at 1728 Valley Ranch Drive, Clio, CA. Viewing your proposed map at the highest resolution available, it does not clearly appear if we are in a high or moderate severity zone. Two comments for your consideration: (1) It would be helpful for homeowners insurance purposes to overlay Firewise Community zones on the map, in our case, the Graeagle Fire District Firwise Community. (2) In order to better identify residence locations, complete the highway lines. For example A-15 from Hwy 70 to Portola is not shown on your map and it would greatly help with locating Valley Ranch on your proposed map. Our fear and concern is insurance companies utilizing this map, in our case, not clearly showing if we are in a high or

moderate severity area. Thank you for your consideration. Charles R. Franck 1728 Valley Ranch Drive P.O. Box 377 Clio, CA 96106ccfranck@gotsky.com

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The Office of the State Fire Marshal has provided an interactive map throughout the process called SRA FHSZ Rollout Application on our website at <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=8a08fca5c54f4e6987800f160e2cf9b2>.

ID 1984, Comment: Please do not raise the fire level to High for Lucerne Valley. I am a senior with low income and have trouble making my bills. A tax increase will put me on the street. I know many seniors that feel the same way.

Response: CAL FIRE adjusted FHSZ in this area to better match the climate and burn probability of the local area.

ID 3196, Comment: Hi, I just want to give 1 simple suggestion regarding fire mitigation in the San Luis Obispo region- a thick layer of wood chips next to Highway 101 North going up the Cuesta Grade. Wind often blows up and across the freeway and up the hillside on the east side of the freeway (next to 101 north). And a buffer along the edge of the freeway on just that one side would really help keep any ignition source from quickly catching that hillside on fire, which happens almost annually. Thanks for what you do Ben Sent from my iPhone

Response: CAL FIRE adjusted FHSZ in this area, where necessary to better reflect current land use and wildland fuels.

ID 3373, Comment: July 23, 2023 Daniel Berlant Acting State Fire Marshal/Deputy Director California Department of Forestry and Fire Protection 715 P Street Sacramento, California 95814 Mr. Daniel Berlant, I am writing this letter in support of Chief Jonathan Stornetta, City of Paso Robles, CA 93446, recommendation for a change in the Fire Hazard Severity Zones as proposed in the attachment to this letter. I fully support his recommendation. Sincerely, Shirley Mark 1885 Nacimiento Lake Drive Paso Robles, CA 93446-8709

Response: CAL FIRE adjusted FHSZ in this area, where necessary to better reflect current land use and wildland fuels.

ID 1896, Comment: March 22, 2023 Office of the State Fire Marshal California Department of Forestry and Fire Protection P.O. Box 944246 Sacramento, CA 94244-2460 Attn: Scott Witt, Deputy Chief Re: Notice of Proposed Rulemaking concerning the Regulations Relating to Fire Hazard Severity Zones in the State Responsibility Area. Dear Deputy Chief Scott Witt, As Members of the Lucerne Valley Unified School District (LVUSD), we are proud to serve a diverse community in and around Lucerne Valley providing teachers, students, and parents with voice and choice in the type of educational opportunities available within the public school system. Our school community is made up of close to 90 percent Socio Economically Disadvantaged families. As Superintendent of LVUSD I am submitting these comments to the Notice of Proposed FHSZ Rulemaking on behalf of LVUSD and the community we love and serve. I would like to begin by thanking you and CDFFP for listening to the stakeholders and extending the comment period to April 4th. This extension is particularly important to LVUSD and the communities we serve as we were completely unaware of this proposed rulemaking and the initial comments deadline of February 3rd. Our lack of awareness, however, speaks only to

the overall inadequate public outreach process by CDFFP for stakeholder input to this proposed ruling. As a California Public School District impacted by the Proposed FHSZ Rulemaking, we feel we should have been directly notified, especially given the sensitivity by your department to potential fiscal impacts on Public School Districts identified on page 12 of your December 16th, 2022 Notice of Proposed Rulemaking Action (NOPA): “Cost to any local agency or school district which must be reimbursed in accordance with Government Code, Sections 17500-17630” We also recently learned our County Board of Supervisors, the first line of elected representation to our unincorporated communities on land use matters, was unaware of the proposed rulemaking and stakeholder input period. This is stunning! We were further disappointed to learn (also after the initial comment period deadline) that only one public hearing was held on January 10th at 11:00 A.M. at the County Office of Administration in the City of San Bernardino. The County of San Bernardino is the largest county in California and even the lower 48 states. Some of the areas affected by the proposed rulemaking are as much as 160 miles round-trip from this chosen hearing location. Additionally, the City of San Bernardino is an urban area in the Local Responsibility Area (LRA) and is unaffected by the proposed State Responsibility Area (SRA) rulemaking. To hold just one hearing in the largest county, in a non-stakeholder city, then at a building with no satellite remote connection capabilities, is completely inadequate for stakeholder participation and therefore unacceptable! This proposed SRA rulemaking has become the most controversial issue our community is facing. We are fully engaged in the process given LVUSD and our community members are now painfully aware of the proposed FHSZ changes. I can assure you a newly scheduled hearing held closer to our impacted communities, with officials from your department available to answer the many questions we and impacted community members have, will undoubtedly bring you the stakeholder input you claim to seek. We ask that you reschedule public hearings on this matter and further extend the public comment period to end only after newly scheduled hearings are held. It has been 15 years since the last rulemaking on Fire Hazard Severity Zones. Another 30 days or so should not be detrimental to the process. As to the process of revising the SRA Fire Hazard Severity Zones that CDFFP is currently engaged in, I can honestly state this has been one of the most confusing and complicated matters I have ever attempted to unpack. I had difficulty trying to explain this to my board and staff at a recent board meeting. Truthfully we still have questions I hope can be answered before the comment period ends. At this time I am somewhat unsure of what it is we are commenting on as it relates to the proposed changes to the zone ratings. This confusion stems, in part, from conflicting information we have obtained from the Office of the State Fire Marshal website and maps, recent email correspondence with that office, and Cal Fire LRA maps identifying the LRA areas that up to now we believed the LVUSD property in question belonged to. Starting with the OSFM website slider arcgis map (<https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=fd937aba2b044c3484a642ae03c35677>), the information sidebar establishes: “By default, 2023 Fire Hazard Severity Zones are on the left side of the screen and not transparent. 2007 Fire Hazard Severity Zones are on the right side, and much more transparent. The 2007 data has been limited to current SRA to reduce confusion (emphasis added). To compare an area use the Swipe tool to pull the 2023 zones back and forth.” When viewing the right side of the slider bar to see the “current SRA” as established by the map information panel, the LVUSD property in question is not an SRA property. When viewing the left side of the bar to see the proposed FHSZ updates, our property is being slated for a High FHSZ (orange). We asked, how could this be since the same map identifies the property as currently not in an SRA, and the SRA has supposedly not changed since 2007? On

March 2nd I sent an email to your department requesting clarification on the matter. To the department's credit I received an email reply on March 3rd, oddly enough from an unidentified staff member, stating our property was incorporated into an SRA FHSZ in late 2005. It was further stated the 2007 map (previously referred to above) did not show us in the SRA because it was produced from data prior to late 2005 when we were an LRA property. Why would CDFFP purposely publish a map to be used for stakeholder comment on the currently proposed SRA rulemaking that is not current as the maps own information sidebar claims? LVUSD has historically believed we are in the LRA as indicated by Cal Fire's own LRA map dated November 13, 2008. (https://osfm.fire.ca.gov/media/6783/fhszl_map62.pdf) If we were incorporated into the SRA in 2005 as the email reply explains, how can this 2008 LRA show our property as in the LRA instead? When you combine this with the 2007 map also showing us excluded from SRA, you can easily see how this conflicting data has been the source of much confusion. To this date we have no formal documentation that we are currently in an SRA FHSZ. To the contrary, all maps show we are in the LRA. Even if we are to accept we are an SRA property, how can we possibly be expected to adequately comment on the proposed rulemaking establishing the LVUSD property in an orange "High" severity fire zone? What SRA zone are we currently in? Are we being downgraded from Severe? Upgraded from Moderate? Are we staying High from the current rating? What exactly are we commenting on? Without knowing the answers to these questions and our property responsibility area history, we are forced to narrow our comments to a generic High severity orange zone being suggested for our property in the currently proposed rulemaking. By your own criteria, it is difficult to imagine why our district property would be considered in a high severity fire zone. We are not in a watershed area. Instead we are in typical Mojave Desert scrub area with non-contiguous creosote shrub and only occasional seasonal grasses depending on spring moisture. We do not have natural surface or near surface water fed trees growing in our lower elevation. In fact the well that serves the property is several hundred feet deep. Even our "dry washes" contain inadequate surface water to support trees and riparian-type vegetation. The fuel load you would expect to see in a High or Severe fire hazard zone does not exist in and around the LVUSD property. This is further substantiated by your own wildfire history map showing a 150-year history of little to no wildfires in our area (<https://projects.capradio.org/california-fire-history/#11.25/34.3729/-117.0513>). You have to move back to the higher elevations far south of us to find ground conditions conducive to wildfire potential as indicated by your map. We see no logic in placing the LVUSD property in a FHSZ rated High (orange). At our March 9th meeting the LVUSD Board gave unanimous approval to submit comments opposing this FHSZ distinction for our school district and community. Our school board is made up of the only locally elected officials in Lucerne and Johnson Valleys. They represent our communities and strongly disapprove of the process, logic, data, or final determination you have made. We are especially concerned over your perceived "worst case scenario" methodology being used to justify SRA zone intensity upgrades. This is not a logical approach in our opinion. Our school district has successfully grown by 60 percent over the last 7 years. This was done not through planning by "worst case scenario." This was done through "conservative" planning. The impacts to future growth of our community and our school district by increasing the SRA FHSZ ratings cannot be ignored. The increased building standards and real estate agent disclosure requirements will impact our very slow but steady post-2008 housing crash growth. Furthermore, LVUSD strongly disagrees with the CDFFP position that insurance availability and rates will not be negatively affected by this proposal. In fact, we have written confirmation from our Risk Management insurance provider

that a FHSZ intensity upgrade WILL impact our insurance rate. We have no doubt the good people of this community will also experience impactful changes to insurance rates and availability. The nature of CDFFP's position that insurers do not use FHSZ ratings in their rate structures is highly speculative in our opinion, will not reflect what we expect to see happen to rates and availability already being squeezed by non-fire hazard related issues, and is reminiscent of the speculative nature of the "50 year" model being used to justify FHSZ upgrades in the first place, among the other speculative in nature used methodology we are observing. The use of Highways 247 and 18 as boundaries to the SRA is arbitrary and the methodology used to determine the severity of the FHSZ's seems just as arbitrary and not based on actual on-the-ground conditions. As previously stated, Lucerne Valley is a low-income rural community with a high population of socio- economically disadvantaged families and those retired and living on fixed incomes. Communities like ours are impacted by decisions like this with huge disparity. We see the same disparity in funding for our small school district, through formulas that are influenced by the louder voices from urban school districts that favor them for their size and location. We must resist disparity to survive. We have more to fear from the inevitable negative impacts these upgraded FHSZ's in the newly proposed maps will have on us, than the possibility of a wildfire the Cal Fire 150-year wildfire history maps show is unlikely. It is for all the reasons above that we oppose the changes to the current State Responsibility Area Fire Hazard Severity Zones outlined in the current proposed rulemaking map. We strongly agree with Assemblyman Tom Lackey's letter to Acting State Fire Marshal Daniel Berlant dated February 21, 2023. His concerns over insurance cost and availability are founded and supported by our communication with the school district's insurer. We share his assertion the use of "extreme fire weather" predictions in your FHSZ rating methodology is flawed and unnecessarily overrides the validity of actual and reasonably predictable conditions instead. We ask that the proposed FHSZ intensity maps be reconsidered and any modifications to LVUSD and Lucerne Valley property FHSZ's be done with stakeholder input. CDFFP can demonstrate sincerity in its stated desire for stakeholder input by rescheduling the hearings, holding them in the SRA areas directly impacted by the FHSZ proposed rulemaking, and only closing the written comment period after the hearings are completed. Again, it has been 15 years since the FHSZ's were last reviewed. Adding an additional 30 days or so to the process can only help, not hurt.

Response: CAL FIRE adjusted the non-wildland extent in this area to account for the development. CAL FIRE's maps are intended to drive local planning decisions, not insurance decisions. Under Commissioner Lara's new regulation finalized in October 2022, insurance companies must provide discounts for wildfire safety actions such as community mitigation and home-hardening, which CAL FIRE's maps do not assess. In addition, insurance companies are already using risk analysis tools and models that go beyond CAL FIRE's proposed maps in determining what properties they will underwrite. Commissioner Lara's new wildfire safety regulation will help increase access to insurance by promoting wildfire safety across the state. Reducing wildfire risks throughout the state is the primary way we can make insurance more available and affordable, and our regulation is a major step towards that goal. CAL FIRE's maps support that goal through improving public education about hazard and the need for safety preparation. Project timelines may be uncertain and variable, therefore wildland areas targeted for development are not considered part of the non-wildland until construction has begun. In cases where development replaces agriculture use, the area is already zoned as non-wildland. Project timelines may be uncertain and variable, therefore wildland areas targeted for

development are not considered part of the non-wildland until construction has begun. In cases where development replaces agriculture use, the area is already zoned as non-wildland.

ID 821, Comment: Memo to: Cal Fire at FHSZcomments@fire.ca.gov. From: Scott Sibbald and April Chapman, 4202 Burnham Ct. Santa Rosa, CA. 95404 Subject: Fire Hazard Severity Zone Map Date: January 25, 2023 As a homeowner at 4202 Burnham Ct., Santa Rosa, CA 95404, I am concerned about your proposed Fire Hazard Severity Zone Map where you are proposing that my address and the entire 320 acres of Summit View Ranch be included in the Very High Hazard Severity Zone (Red). The reason for my concern is that this change could negatively impact many aspects of my home ownership including property valuation, ability to sell my property, and cost of property insurance. I understand that your maps evaluate “Hazards” based upon the physical conditions that create the likelihood of fire behavior over a 30–50-year period, which you have summarized as the “likelihood of a damaging event”. I have reviewed the Sonoma County Hazard Mitigation Plan and confirmed that back to 1939 there has not been any wildland fire on the Summit View Ranch or even close to our property. (Refer Figure 8.9 Historic Fires). I have personally resided on Summit View Ranch for the past 40 year with a first-hand knowledge and history of the “physical conditions” of the property such as frequent fog layers, wind patterns and humidity levels. I have also reviewed the California OES web site <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fmyhazards.caloes.ca.gov%2F&data=05%7C01%7CFHSZcomments%40fire.ca.gov%7Ced5fe98c0421415fd4c908db031abad2%7C447a4ca05405454dad68c98a520261f8%7C1%7C0%7C638107185551987745%7CUnknown%7CTWfpbGZsb3d8eyJWljoimC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=qnlWWItt5xmBCEhOUjvbk%2BGHaXL9%2BTyPCRk75AiRoIE%3D&reserved=0> The Fire Hazard Severity map shows the Summit View Ranch is in the moderate (yellow) and high (orange) rating, not the very high rating (red). I would like to know the exact “physical conditions” and methodology Cal Fire is using to determine the proposed “Very High Hazard Severity” rating. I am also curious as to why two State agencies would have different ratings for the same property. The Summit View Homeowners Association will be addressing all the history of Fire and disaster mitigation effort completed by homeowners in a separate correspondence. I appreciate your holding public hearings on this subject, which our HOA participated in, and in your commitment to responding to our questions. Scott Sibbald April Chapman

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. CAL FIRE used the best available science and data to develop, and field test a model that served as the basis of zone assignments. The model evaluated the probability of the area burning and potential fire behavior in the area. Many factors were included such as fire history, vegetation, flame length, blowing embers, proximity to wildland, terrain, and weather. A 2 km grid of climate data covering the years 2003-2018 is being used in the update. The previous model used stock weather inputs across the state to calculate wildland fire intensity scores. The updated model will adjust fire intensity scores based on the most extreme fire weather at a given location, considering temperature, humidity, and wind speed. In addition, ember transport is being modeled based on local distributions of observed wind speed and direction values instead of using a generic buffer distance for urban areas adjacent to wildlands.

ID 1007, Comment: Hello, I serve on the Board of our FireSafe Council, the boundaries of which can be seen at this map:<https://www.southskylinefiresafe.org/about/service-area-maps/In>

summarizing the FHSZ map changes within our boundaries WRT the prior map, I noted to our Board that much of our area south of State Hwy 9, within both Santa Clara and Santa Cruz Counties switched from the High to Very High categorization. We would like to update our understanding of hazard differences locally that could potentially factor into our planning for future vegetation reduction projects or targeting homeowners for HIZ advisories. We already spoke with our pre-fire engineer liaison at the CZU CalFire unit, Frank Rogers, who suggested we submit a question about this to you. What were the top two or three modelling factors that played the greatest role in shifting the hazard category from High to Very High for the areas surrounding State Hwy 35 (Skyline Blvd) located south of State Hwy 9 in both Santa Clara and Santa Cruz Counties? Please refer to the map in the link I provided above if needed. Many thanks in advance. Regards, Jane Manning Secretary for the Board South Skyline FireSafe Council

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. CAL FIRE used the best available science and data to develop, and field test a model that served as the basis of zone assignments. The model evaluated the probability of the area burning and potential fire behavior in the area. Many factors were included such as fire history, vegetation, flame length, blowing embers, proximity to wildland, terrain, and weather. Classification of a wildland zone as Moderate, High or Very High fire hazard is based on the average hazard across the area included in the zone, which have a minimum size of 200 acres. In wildlands, hazard is a function of modeled flame length under the worst conditions and annual burn probability. Both these factors generally increase with increasing hazard level, but there may be instances where one value is Very High and the other is low, pushing the overall hazard into a more intermediate ranking. On average, both modeled flame length and burn probability increase by roughly 40-60% between hazard classes. Classification outside of wildland areas is based on the fire hazard of the adjacent wildland and the probability of flames and embers threatening buildings.

ID 3228, Comment: June 28, 2023 Senator Dodd 1021O Street, Room 7610 Sacramento, CA 95814 RE: VHFHSZ designation in the area of Arlington Street, Martinez CA 94553. Senator Dodd; The zone that we are located in is mostly oak tree; a tree designated as Fire-Safe (Pacific Horticulture). Fuel ladder is limited in the area, other than a few patches of coyote brush and grass. I want to know the metrics involved labeling our as Very High Hazard Severity, so that we can either; A) abate the hazard, or B) determine if it is just a computer model label, artificially applied in error. The parameters of the maps designated Very High Fire Hazard-Severity Zone, follow an imaginary city boundary line (exactly), where just on the opposite side it is re-zoned as "Moderate", yet having zero contrasting terrain, weather, or vegetation difference. How does flammable vegetation grow along a city boundary survey line with a twofold difference on the other side? Our neighboring town of Port Costa is located in a steep draw with stands of fire prone eucalyptus trees (a highly flammable invasive plant species). While Port Costa is located in steep terrain with fire prone trees, and exposed to greater wind events, the severity of Port Costa is listed as "Moderate", much less than the designation provide for the oak tree zone in Martinez. Why is highly flammable invasive tree in a steep wind swept canyon considered "Moderate", and our fire-safe trees labeled Very High Hazard Severity? Computer error with no site condition verification? The Zone label VHFHSZ designation is applied to the real estate disclosure has a derogatory impact. The VHFHSZ designation also place our properties in the highest insurable risk category, where we are seeing cancelations and rate increases far above

other communities. What are the metrics applied, so that we may confront and abate? What report can we locate and review that provided the information for the fire severity maps? I would appreciate if you can provide the request information. Very best regards, Kevin Bacon cc Chris Keithley Assistant Deputy Director California Department of Forestry and Fire Protection's Fire and Resource Assessment Program PO Box 944246 Sacramento, CA 94244 Scott Witt California Department of Forestry and Fire Protection Office of the State Fire Marshal California Natural Resources Building 715 P Street, 9th floor Sacramento, CA 95818

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. In non-wildland areas, zone edges occur based on distance to the wildland edge. Because hazard in these areas is largely determined by incoming embers from adjacent wildland, urban areas that are similar in vegetation type and housing density may have a change in FHSZ class as the distance to the wildland edge increases. Areas immediately adjacent to wildland receive the same FHSZ score as that wildland where fire originates, and the model then produces lower scores as the distance to wildland edge increases. In wildland areas, zone edges are a result of the way zones are delineated. Specifically, zones represent areas of similar slope and fuel potential. Zone boundaries divide zones based on geographic and vegetation features that align with fire hazard potential; although, at a local scale, it may appear that the immediate area is similar on both sides of the edge. The class value within a zone is based on the average hazard score across the whole zone, so areas that are in the same zone but not immediately adjacent to a local area can have an influence on the final zone classification. The data inputs used to develop the Fire Hazard Severity Zones are identified in the Initial Statement of Reasons (ISOR) Title 19 Development (ca.gov). CAL FIRE has developed an additional data package which consists of sequential modeling steps, including any data inputs that were not already publicly available and referenced in the ISOR. The data package encompasses 34 spatial datasets and 8 tables, provided in raster, polygon, and table format. These datasets are formatted for Esri ArcGIS software, except for four tables provided in Excel. Ten of the datasets are updated versions used to produce an edited SRA FHSZ map following the public comment period that ended April 4, 2023. Upon formal adoption of the FHSZ map, the final SRA FHSZ geospatial data file will become available. The data package is available on the FHSZ website Fire Hazard Severity Zones (ca.gov) under the science and methods banner. Mitigations are important for reducing wildfire risk in hazardous areas as identified by FHSZ. Higher hazard implies that compared to other areas of the state, a fire is either more likely to occur, could occur with more intense fire behavior, or both. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk, not a measure of whether or not mitigations have been done. FHSZ is intended for long term planning purposes; it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. Thus, FHSZ zoning justifies the mitigation actions. Separate statutory mandates outside of the OSFM's regulatory scope require that all property in High or Very High FHSZs in the SRA comply with Civil Code 1102.6f, real estate disclosures Assembly Bill 38 (Wood, Chapter 391, Statutes of 2019). These disclosures are known as "AB 38 Defensible Space Inspections," and are not required for property in Moderate FHSZs in the SRA. As a result of the proposed regulations, the boundaries of Moderate, High, or Very High FHSZs in the SRA may shift, altering which properties are required to comply. However, every FHSZ in the SRA is already required to comply with the underlying defensible space requirements of AB 38 located in PRC Section 4291

ID 1781, Comment: Dear Fire Marshall... To be brief, my neighborhood (Cherry and Hilltop) is safe. Majority of the houses are stucco, several tile roofs and well-maintained Landscaping. The biggest elephant in the room is the Salinas River channel where the city has put out numerous fires, created by the Homeless. It's never ending and huge expense for our tax dollars. Fish and Game is the biggest detriment as not going In and cleaning out the river of dead trees and debris. In my lifetime I have never seen such a pile of fuel waiting for a summer fire. It is beyond irresponsible of the city of Paso Robles to allow the State to get by with this disaster. Fourth Generation Paso Roblan, Lorraine Cagliero805-610-3180Sent from my iPad

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk. Higher hazard implies that compared to other areas of the state, a fire is either more likely to occur, would occur with more intense fire behavior, or both. Because FHSZ is intended for long term planning purposes it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. Home hardening is considered a risk reduction method to reduce the impacts of the hazard. Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are to impacts. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk (such as the California Wildfire Mitigation Program).

ID 588, Comment: Calaveras County Verbal Comment #2 My name is Deanna Gonzalez. I live at 3814 Appaloosa Way Angels camp. Bar 20 subdivision. We are definitely a red zone and I have questions concerning the PG&E relationship with the buyers. I understand PG&E is now putting underground quite a bit of power and that will reflect on fire danger. It won't be happening in our area, but has that been considered as far as the red zones? Is are all the red zones above ground power or below ground power? That is something I can't find any research on at the areas on the maps and I was just curious about that. If we are cancelled, which we probably will be this next. Year after the revision from Laura. What are we supposed to do then? What do we do with our homes? So I'm very interested in finding out these answers. If I could get some direction on where the underground power lines are, if they're in the red zone or not.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. CAL FIRE's maps are intended to drive local planning decisions, not insurance decisions. Under Commissioner Lara's new regulation finalized in October 2022, insurance companies must provide discounts for wildfire safety actions such as community mitigation and home-hardening, which CAL FIRE's maps do not assess. In addition, insurance companies are already using risk analysis tools and models that go beyond CAL FIRE's proposed maps in determining what properties they will underwrite. Commissioner Lara's new wildfire safety regulation will help increase access to insurance by promoting wildfire safety across the state. Reducing wildfire risks throughout the state is the primary way we can make insurance more available and affordable, and our regulation is a major step towards that goal. CAL FIRE's maps support that goal through improving public education about hazard and the need for safety preparation. The Fire Hazard Severity Zone map evaluates "hazard," not "risk". The map is like flood zone maps, where lands are described in terms of the probability level of a particular area being inundated by floodwaters, and not specifically prescriptive of impacts.

“Hazard” is based on the physical conditions that create a likelihood and expected fire behavior over a 30 to 50-year period without considering mitigation measures such as home hardening, recent wildfire, or fuel reduction efforts. “Risk” is the potential damage a fire can do to the area under existing conditions, accounting for any modifications such as fuel reduction projects, defensible space, and ignition resistant building construction.

ID 1128, Comment: Solano County Written Comment #6 Susan Dehaven 1/17/23

VacavilleSolanoAgavepress0@gmail.com 707-330-5509 Was a map of rural Vacaville used of the houses that were burned during the LNU Fire. How much did survey cost in rural Vacaville? What is CAL FIRE going to do? How about a Helicopter at Travis Airport so retention acres can be served Also what is CAL FIRE going to different at next fire in rural Vacaville? Wildland Areas vs. Non Wildlands areas? Where are they?

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Recent fires (through 2020) do factor into burn probability in the model, as they reflect trends in fire likelihood within similar climate and fuel groupings. Like other temporary mitigations such as fuel treatments, the effect of wildfires on fuel loads is limited due to vegetation regrowth or type conversion. Because some of the most critical fire safety regulations involve construction materials and methods, which are influential over the entire life of a structure, FHSZ utilizes fuel conditions that reflect the maximal hazard condition likely to occur over a 30-50 year time horizon. Cost associated with personnel cost to create the model, as traditional surveying was not completed. Over the past few years, CAL FIRE has been building the new model for a 2022 update. The latest technologies will be used in the mapping and will include new factors now available including land use changes, recent fire history, new significant wind event data, as well as a model that is more spatially detailed.

ID 1026, Comment: Lake County Verbal Comment #11 Another board member not giving his name. I hear what you're saying, supervisor Green. But but this is just one aspect that we're looking at. We have, we have a holistic view of our communities and what needs to happen. But what I what? I also don't quite understand is what is the benefit? Or is there a benefit? What are there going to be more resources to these areas? Are there going to be more strategic prepositioning? Is there any benefit to having these maps as far as strategies that will change coming from Cal Fire and state response?

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk (such as the California Wildfire Mitigation Program). FHSZ is intended for long term planning purposes.

ID 587, Comment: Mariposa County Verbal Comment #1 Good morning. My name is Francisco de la Cruz. I live in Valley Springs, callers county. My comment is as follows. The fire Hazard Severity zone are a form of redlining due to the severe negative financial impact on the homeowner examples, homeowner insurance, fire premiums go up, sometimes they're cancelled, sometimes you lose your policy. And you have a loss of value at sale of your home. Yet there is no reduction in the property tax assessments during the period of ownership. So you continue to pay taxes on an asset that may be worth less. There needs to be some form of financial mitigation

to reduce the negative impacts of these red zones, similar to the discounts available on automotive insurance examples, safety belts, safe driver training. Clean driving record etc. There needs to be better coordination between Cal Fire and the Insurance Commissioners office regarding the financial impacts of the FHS maps. There should be credits available to folks that meet or exceed fire resiliency standards, EG concrete construction, tile roofs, fuel load elimination, et cetera. There should also be more granular maps similar to those provided by the corporation zesty dot AI that has data available down to the parcel level. There also needs to be an appeal process to revise boundaries or zone designations.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk. Higher hazard implies that compared to other areas of the state, a fire is either more likely to occur, would occur with more intense fire behavior, or both. Because FHSZ is intended for long term planning purposes it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. Project timelines may be uncertain and variable, therefore wildland areas targeted for development are not considered part of the non-wildland until construction has begun. Under Commissioner Lara's new regulation finalized in October 2022, insurance companies must provide discounts for wildfire safety actions such as community mitigation and home-hardening, which CAL FIRE's maps do not assess. The reality is that more accurate risk information enables homeowners and communities to reduce their wildfire risks, and Commissioner Lara's new wildfire mitigation regulation clarifies what actions you should take to reduce wildfire risks. Once that regulation is fully implemented, if a homeowner or business owner takes those risk mitigation actions, they will be able to see a discount in their insurance premium. Public Resource Code 4202; The State Fire Marshal shall classify lands within state responsibility areas into fire hazard severity zones. Each zone shall embrace relatively homogeneous lands and shall be based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have been identified by the department as a major cause of wildfire spread. Government Code 51178; The State Fire Marshal shall identify areas in the state as moderate, high, and very high fire hazard severity zones based on consistent statewide criteria and based on the severity of fire hazard that is expected to prevail in those areas. Moderate, high, and very high fire hazard severity zones shall be based on fuel loading, slope, fire weather, and other relevant factors including areas where winds have been identified by the Office of the State Fire Marshal as a major cause of wildfire spread.

ID 2660, Comment: San Benito County Written Comment #1 March 24, 2023 Office of the State Fire Marshal C/O: FHSZ Comments California Department of Forestry and Fire Protection P.O. Box 944246 Sacramento, CA 94244-2460 Re: Santana Ranch Santana Ranch is in San Benito County east of Fairview Road and generally located between Sunnyslope Road and Hillcrest Road. This subdivision has been zoned in the 2007 and 2023 State Responsible Area (SRA) Fire Hazard Severity Zone map as Moderate shown in attachment. Anderson Homes, the developer for Santana Ranch respectfully requests your consideration to reclassify this area in the Fire Hazard Zoning Map and eliminate the zone designation. We have provided the following attachments, and comments below for your review. Access routes to get in and out of the area are located at Sunnyslope and Hillcrest east of Fairview Road. Standard location of Fire Hydrants is per Sunnyslope County Water District detail attachment. Asphalt streets and street scape have

been constructed in Phases 1 to 8 as shown in attachment. This subdivision is contracted with the City of Hollister Fire Department. The station location is th5 and Sally Street, 2.25 miles away from Santana Ranch. CalFire is adjacent to the subdivision and centrally located east of Fairview Road between Sunnyslope Road and Hillcrest Road. Then address is 1979 Fairview Road, Hollister, Ca 95023. The location is also labeled on attachment. developed areas of the subdivision are graded with minimal slopes. These areas are mitigated with discing and weed removal. There are three site photos showing the development to the south and the undeveloped areas to the north in attachment Phases 1 to 9 have been assigned San Benito County approved addresses as shown in attachment I have attached for your reference and use the most current assessor's parcel map 025-370 shown in attachment: 2007 and 2023 State Responsible Area (SRA) Fire Hazard Severity Zone Map 2. Sunnyslope County Water District, Fire Hydrant Location and Notes, Standard Plan 3. Santana 4. Santana Ranch North, Santana Ranch South. 5. Santana Ranch Address 6. Assessor's parcel map 025-370anch Phasing Overlay Exhibit Thank you for your time and consideration. Sincerely Regina Waldron Vice President Anderson Homes.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk. Higher hazard implies that compared to other areas of the state, a fire is either more likely to occur, would occur with more intense fire behavior, or both. Because FHSZ is intended for long term planning purposes it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. Project timelines may be uncertain and variable, therefore wildland areas targeted for development are not considered part of the non-wildland until construction has begun.

ID 591, Comment: Hello, my name is Joel, baby, my wife told most of my Thunder here by what she talked about earlier. So let's go over. We live at 3636 State Highway 140. Got these valley top of Bradley. My wife has been on that property continuously for about 45 years. There was a short scammer. We didn't live on the property, but she's lived on that ever since. Your fire maps from calfire-forestry.map.argorarcgis.com so that there were four fires on the property. There has not been a fire on the property. The maps inaccurate. The only fire that was put there was in 1970, which was on part of this year. Guys's information was a fire. They called it a treatment, but we call it control burns and they did a control burn in the 1970s. There, like control burn, should not be part of the mapping process to count against you for having a fire on your property. When it was done for the purpose of controlling wildland fires. We also see that on this thing that our map location of three 636-8140. 2010 there was a Detwiler fire. There was no debt. Water fire on 3636, State Highway 140. Now, I believe in 2010, probably there was a fire down in Hunters Valley. That was on Detwiler Road. But it did not come anywhere near us. It stayed and went over to Bear Valley and went basically kind of a. And northerly direction from us. In 2017, we did have the Detwiler fire. And during that fire a year in front of that, we decided we would put in. Some cat line around it, sort of fire guard. For no particular reason is we thought might be a good idea and we did, and single blade wide and I had Cal Fire employees that I know personally and said that a. Just a single blade is not going to do you much good, and they're probably correct, but we did it anyway and we've been doing it ever since. We put that in and they've had a fire. I don't know if that thing helped or not. I do know that the fire ran along the edge of it for a little bit and then took off. Our property sends to it looks like to me because of

the debt, water, fire, the head of it came right at us. We couldn't get a Cal Fire truck to stay there. And it wasn't because it was scary or bad. It was because there was no form to do. The fire came up off of Guadalupe, went to the South. East. Wrapped around Guadalupe heading that way came up out of Rasters Gulch on the other side of high 140 of US, and followed Rasters Gulch out kind of going in a Northerly direction, I guess NE direction. So basically just run around us. Why is that? Probably because of the lay of the land. But yet we are being put into this category for these tests. I do not know how you can have a test of your. You know you're fire and stuff that you go with, you know, for flame length, amber cast and all this when it never happened on this one particular piece of ground and. I do understand databases from previous employment and I know that you can enter things in there and it will count multiple times if you enter wrong and so I think with your data that you have, you guys really need to look at that and make sure it's accurate so that when it does come out, it's accurate. I support the map. I think we need it, not a problem with it as long as the data in there and the way in the mechanism that it is being chosen comes out and people can understand it. I don't believe anybody could come to my property and tell me why. We didn't have overcast. I don't know, but we didn't. And the fire went all around us. Why did the other topography flame linked vegetation? It's all the same and it doesn't make any sense to me. I don't believe you can have one fire and call. Hold that against a piece of ground. In over 5658 years. The. Last part of it here cuz I kind of went off script a little bit. I would like to see the data that was used as a public records request for how you got to this point on this ground and it's the area because I don't think you guys can produce that. I don't think it was specifically done with an area. I think it was done with a paintbrush. Big wide sweeps and it makes it easier. I get it. I understand that. But I think that it needs to be more directly done. You guys are supposed to come out and do 4290 inspections every three years or so. Been there 10 years in this House. I've only seen you guys out there when we had the building permit issued for occupancy. If you guys followed the 40 two 90s and went out and did inspections, you would probably have a better mapping system because you could say that went to 3636 and this place is a death trap. Stay away and you'd be able to put it in a high rate. Where you can go and say no, there's nothing wrong here and the neighbors are doing the same thing, and so maybe this area should be a moderate. It probably won't help with the insurance companies because we live in California and they're just going to say it's California. But I also think that if you're going to take in. Use a map like this. It would be much easier and more economical to say that. Well, not anymore, but. Pretty much from June to November, any place in California is going to burn. It's going to catch on fire. That's just how it is anymore. So we should just paint the whole state red and just call it over and be done with it. But last part is is Cal Fire because they are designating this area. Is basically Armageddon. The majority of the county anyway. Are you guys going to staff up in accordance to that? Thing that you're saying is going to happen. We're going to have this extreme fire. Are you staffing up for that? I don't believe you are because you have two engines and at the headquarters. Yeah, I think 1 engine. And and you, Selena 2IN coulterville one in Hornitos and one in Kathy Valley. I don't see you guys staffing up for your own project. If we live in that bad of an area, you should be staffing up for that.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Recent fires (through 2020) do factor into burn probability in the model, as they reflect trends in fire likelihood within similar climate and fuel groupings. Like other temporary mitigations such as fuel treatments, the effect of wildfires on fuel loads is limited due to vegetation regrowth or type conversion. Because some of the most critical fire safety

regulations involve construction materials and methods, which are influential over the entire life of a structure, FHSZ utilizes fuel conditions that reflect the maximal hazard condition likely to occur over a 30-50 year time horizon. The fire hazard severity model for wildland fire has two key elements: probability of an area burning and expected fire behavior under extreme fuel and weather conditions. The zones reflect areas that have similar burn probabilities and fire behavior characteristics. The factors considered in determining fire hazard within wildland areas are fire history, flame length, terrain, local weather, and potential fuel over a 50-year period. Outside of wildlands, the model considers factors that might lead to buildings being threatened, including terrain, weather, urban vegetation cover, blowing embers, proximity to wildland, fire history, and fire hazard in nearby wildlands. FHSZs are not a structure loss model, as key information regarding structure ignition (such as roof type, etc.) is not included.

ID 109, Comment: Can you include severity color chart on address lookup page? It would be helpful to not need to go back and forth on different screens. Properties with grazing livestock should have a lower fire risk rating. Mainly property zoned LEA for Sonoma County.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The Fire Hazard Severity Zone map evaluates “hazard,” not “risk”. The map is like flood zone maps, where lands are described in terms of the probability level of a particular area being inundated by floodwaters, and not specifically prescriptive of impacts. “Hazard” is based on the physical conditions that create a likelihood and expected fire behavior over a 30 to 50-year period without considering mitigation measures such as home hardening, recent wildfire, or fuel reduction efforts. “Risk” is the potential damage a fire can do to the area under existing conditions, accounting for any modifications such as fuel reduction projects, defensible space, and ignition resistant building construction.

ID 1025, Comment: Another board of supervisor that did not give his name. You know, as the chief was mentioning, home hardening, we have an entire community that have been rebuilt to the most current standards and you know we must have that reflected here. I'm in the middle of this giant red BLOB that is most of the carbon Anderson Springs community. We have homes that are entirely built. After 2017, 2018-2019, 2020, those are all with the current standard and home hardening and defensible space. And there's not recognition of that in these maps. That's very quickly again. Supervisor green. I'm going to part ways with the speakers and my colleagues on the algorithm on the request that we start analyzing fire risk in these maps as opposed to fire hazard. Uh, the fire hazard is the thing on the map that creates the incentive to start hardening your homes and stuff like that. I don't hear anybody attacking the science that drives the hazard assessment, and we have lived through so many wildfires in this county in the last several years. We've seen the wall of flames we haven't seen just garden variety wildfires. We've seen catastrophic wildfires that we have never seen the scale of before. So, I don't know that it is. Helpful in any way to say ohm we need credit for a vegging out a brush around my home. We get credit for a home hardening when the Riviera burns and not if it burns. But when it burns it's going to be catastrophic. People are going to lose their lives. And we've seen this movie before Paradise, one of my first jobs out of college was in Paradise. They talked about at 30-40 years ago. Boy, when this place burns, it's going to be bad. How much home hardening happened around there? How many lives were saved by all the home activities? When it comes to insurance and concerns on that, absolutely we're talking to the wrong people. We need to talk to the insurance Commissioner, the governor, whatever. It's not Cal Fire. We're not going to game

the hazard maps so that we can get a break on our assurance. Rather, we should accept what the hazard map says. Basically, the entire county, given the right climate conditions, convert. What are we supposed to do about that? The discussions we have come after the assessment of the hazard. So, I believe the assessment of the hazard and the revised maps is. Dead on, correct? If we want to talk about the other things that have been addressed here in other venues and in other mapping tools, that's certainly appropriate. We can talk about it, but the hazard assessment mapping is absolutely spot on, correct. Thank you. Positive comment about maps

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Home hardening is considered a risk reduction method to reduce the impacts of the hazard. Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are to impacts. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk (such as the California Wildfire Mitigation Program).

ID 703, Comment: Monterey County Verbal Comment #3 Hi, my name is Fred Rubin. I'm representing the buranda Garza's Firewise community. First of all, thank you very much for organizing this and having this here and the online website really had a lot of information. I did not ever see the maps, and I did send an inquiry into the maps. Uh, where the how the maps have changed, and I did not get a response. That said, there's actually an addition I would like to have seen that I have not seen regarding fire hazard zones and that is evacuation routes and the population versus the capacity of the roads. And if it is not addressed at this level and it may be and I apologize if I don't didn't see it, but if it's not addressed at this level, it is not passed on to the rest of the Community. But it's not passed on to our Board of Supervisors, and in particular the Carmel Valley Rd committee that I work with. It's not taken seriously until it is listed, so I saw you had paradise up on the map and I would appreciate any. Any credence that can be given to the severity of our Rd capacity in the event of evacuations?

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Public Resource Code 4202; The State Fire Marshal shall classify lands within state responsibility areas into fire hazard severity zones. Each zone shall embrace relatively homogeneous lands and shall be based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have been identified by the department as a major cause of wildfire spread. Government Code 51178; The State Fire Marshal shall identify areas in the state as moderate, high, and very high fire hazard severity zones based on consistent statewide criteria and based on the severity of fire hazard that is expected to prevail in those areas. Moderate, high, and very high fire hazard severity zones shall be based on fuel loading, slope, fire weather, and other relevant factors including areas where winds have been identified by the Office of the State Fire Marshal as a major cause of wildfire spread.

ID 2197, Comment: I live in Guerneville area and really appreciate the long overdue updates of our area from Moderate to High Severity. I'm hoping that this update will improve funding and enforcement of existing laws. Attempts to get financial help for creating defensible space has been impossible. Initially, I was told that my area wasn't high risk even though we've been evacuated twice and we live on a 45 degree slope that's heavily forested, covered in dead and diseased Tanoaks and French Broom and our two way roads are maybe 13ft wide and few homes have legal parking that isn't right in the road ways. Now they are offering grants for our area which are in no way high enough to cover the cost of creating defensible space on lots that have

such difficult access. We don't even have enough road space to take advantage of the free chipper program, For the 3rd time I've been offered free advice on what should be done to mitigate fire risk. It's outrageous that funds are being spent on this redundant service. I've contacted the the local Sheriffs, CHP and fire dept responders about enforcement of keeping our narrow roads clear of illegally parked cars, garbage piles and fire fuel hazards. No one has responded, except for the Monte Rio Volunteer Fire Chief, Steve Baxman who already has too much on his plate. From others I've only gotten a lot of shoulder shrugs and comments about it being like this all over our area. It's also been suggested that so long as people can squeeze a single car past these obstacles I need to stop complaining. Tia Resleure Old Monte Rio Rd, Guerneville

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Mitigations are important for reducing wildfire risk in hazardous areas as identified by FHSZ. Higher hazard implies that compared to other areas of the state, a fire is either more likely to occur, could occur with more intense fire behavior, or both. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk, not a measure of whether or not mitigations have been done. FHSZ is intended for long term planning purposes; it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. Thus, FHSZ zoning justifies the mitigation actions.

ID 1821, Comment: Absolutely No!!!! Sincerely, Mary Stacy796 Angus St Paso Robles, CA 93446512-963-1318

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking.

ID 876, Comment: OK. I'm not sure how I can make this a comment instead of a question, but I'm Beverly Anderson 3551 Vista Grande Dr, Shingle Springs and my comment is if you can't question to clarify what you're hearing, what's the point in hearing it? What can we comment on that might give us more information about how we got from yellow to red perhaps?

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The Office of the State Fire Marshal followed PRC 4203(b) which requires that a public hearing be held in each county with a designated Fire Hazard Severity Zone. Public Resource Code 4202; The State Fire Marshal shall classify lands within state responsibility areas into fire hazard severity zones. Each zone shall embrace relatively homogeneous lands and shall be based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have been identified by the department as a major cause of wildfire spread. Government Code 51178; The State Fire Marshal shall identify areas in the state as moderate, high, and very high fire hazard severity zones based on consistent statewide criteria and based on the severity of fire hazard that is expected to prevail in those areas. Moderate, high, and very high fire hazard severity zones shall be based on fuel loading, slope, fire weather, and other relevant factors including areas where winds have been identified by the Office of the State Fire Marshal as a major cause of wildfire spread.

ID 2141, Comment: Delivered by Email: fhszcomments@fire.ca.gov To Whom It May Concern I am writing to express my opposition and concerns regarding the potential rezoning of my property, located at 18700 Janach Ct, Cottonwood CA, into an Extreme Fire Hazard Area. The proposed rezoning is not warranted in this case because my property complies with the

regulations set forth in the California Code of Regulations, Title 14, Division 1.5, Department of Forestry and Fire Protection, Chapter 7, Subchapter 3, Article 1, Section 1280.01, which determines fire hazard severity. As per Section 1280.01, a property's fire hazard severity is determined by taking into account factors such as the type, amount, and arrangement of vegetation; the terrain; and the proximity to other structures. Based on these criteria, my property does not fall under the category of Extreme Fire Hazard Area. Furthermore, I would like to highlight the following factors that support my claim: Fire-Resistant Landscaping: My property is surrounded by fire-resistant landscaping, which has been diligently maintained to reduce the risk of wildfires. This includes the use of fire-resistant plants, the removal of dead vegetation, and the creation of defensible space around the property. Adequate Defensible Space: In accordance with CAL FIRE recommendations, I have maintained a minimum of 100 feet of defensible space around my property. This space is cleared of flammable vegetation and other combustible materials, which significantly reduces the chances of a wildfire spreading to my home. Fire-Resistant Building Materials: The construction of my home includes the use of fire-resistant building materials, such as a Class A-rated roof, dual-pane tempered glass windows, and non-combustible siding, gutter guards. These materials help prevent the ignition of the building in the event of a wildfire. Regular Maintenance and Inspections: I have taken the responsibility of conducting regular maintenance and inspections to ensure that my property remains in compliance with all fire safety regulations. This includes the proper maintenance of gutters, vents, and chimneys, as well as the prompt removal of any hazardous vegetation or debris. Community Fire Safety Efforts: The community in which my property is located has made significant efforts to implement fire safety measures and practices. This includes the establishment of a local Fire Safe Council, participation in the Firewise USA program, and the ongoing efforts to educate residents on fire prevention and preparedness. In light of these factors and in accordance with the regulations set forth in the California Code of Regulations, Title 14, Division 1.5, Department of Forestry and Fire Protection, Chapter 7, Subchapter 3, Article 1, Section 1280.01, I kindly request that you reconsider the proposed rezoning of my property into an Extreme Fire Hazard Area. I am confident that the steps I have taken, in conjunction with the efforts of my community, are sufficient to mitigate the risk of wildfires and protect the safety of residents in the area. I would appreciate the opportunity to discuss this matter further and provide any additional information or documentation that may be required. Please feel free to contact me at 530-945-6076 or sdnelson@shasta.com to schedule a meeting or discuss this matter further. Thank you for your attention to this matter, and I look forward to your prompt response. Sincerely, Stephen Nelson

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are to damage. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk. Firewise community activities are targeted at reducing the risk to communities from the associated hazard and are consequently almost always in communities that have FHSZ zones in them.

ID 767, Comment: My name is Mike Dankie. I live on Walnut Creek Rd, Chico, CA. And I really appreciate you guys putting this on. And I respect your work. Uh, my only concern is that someday someone in Sacramento may take this. Evidence that you've gathered and say, aha, we've got these people. Let's tax them. Where they live and the guy in the greatest worst zone is gonna probably get taxed the most. If someone comes up with this idea. I'm really against that. I

don't. I'm not against the program. I fear fire every summer and fall. I protect my house. I do what I can. I can't do anything about Sacramento taxi me one more time for something. Just because I live someplace. That's it. Thank you guys for all your work.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. FHSZ is intended for long term planning purposes it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. The proposed regulation only designates Fire Hazard Severity Zones (FHSZ) in the State Responsibility Area (SRA). Local ordinances and taxes are a function of the local jurisdiction, and the Office of the State Fire Marshal does not regulate local ordinances.

ID 616, Comment: My name is Mina label. I'm the legislative affairs manager for the city of Thousand Oaks, and as you know, in 2018 we suffered tremendous loss with the Woolsey fire. We just want to I'm here on behalf of the city, wanting to thank you for a holding a local hearing because I know what it's like to travel to Sacramento on a quarterly basis to deal with hearings and just having a local hearing is very helpful. We've got two elements that are city are emergency services coordinator as well as our county. Excuse me, our Costco, which is our open space collective between our park district and the city. I will make sure that they are aware of the new maps that is being proposed and we should be getting a formal letter. Umm. And we would like to, in cooperation with the Ventura County Fire District, just coordinate with them and let them know some of the content that we have and some concerns and interests that we have with this new map being proposed. But I just want to thank you for being here and like, you know that city of Thousand Oaks comments are forthcoming within the 45 day period.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The Office of the State Fire Marshal followed PRC 4203(b) which requires that a public hearing be held in each county with a designated Fire Hazard Severity Zone.

ID 1397, Comment: Hello, Mr. Bruce Cubberley of Julian called our office in response to the extended comment period for the fire hazard severity zone maps. He lives in a high fire prone area that is adjacent to the Cleveland National Forest and the State Park. Neither is properly managed. Both are heavily overgrown. This is creating a major fire hazard for rural residents. He requested that this office forward his complaint. Thank you, Tom Stinson District Communications Director Assembly member Marie Waldron, AD 75350 W 5th Avenue #110Escondido, CA 92025Phone: 760-480-7570Fax: 760-480-7516

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Public Resource Code 4202; The State Fire Marshal shall classify lands within state responsibility areas into fire hazard severity zones. Each zone shall embrace relatively homogeneous lands and shall be based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have been identified by the department as a major cause of wildfire spread. Government Code 51178; The State Fire Marshal shall identify areas in the state as moderate, high, and very high fire hazard severity zones based on consistent statewide criteria and based on the severity of fire hazard that is expected to prevail in those areas. Moderate, high, and very high fire hazard severity zones shall be based on fuel loading, slope, fire weather, and other relevant factors including areas where winds have been identified by the Office of the State Fire Marshal as a major cause of wildfire spread.

ID 3409, Comment: Please reassess map Thank you

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The Office of the State Fire Marshal is reassessing the map based on comments received from the public.

ID 2335, Comment: Issue 1The proposed SRA updated maps do not take property lines, roads or other topographical features into consideration when defining boundaries between zones. This will lead to confusion during enforcement of building standards that are dependent upon the Fire Hazard Zone classification because there are many situations on the map where existing buildings are split between two different Fire Hazard Severity Zones. For ease of application by the public and local jurisdictions, authority should be granted in the Title 19 regulations that allow local jurisdictions some latitude on Fire Hazard Severity Zone designation based on knowledge of local conditions to make very minor adjustments to the maps on file with the State Fire Marshal. Below I have proposed an amendment to the proposed Title 19 regulations that will give authority to local jurisdictions to make modifications. Another option is to modify the proposed T-19 regulations to specify how enforcement of State Fire Marshal adopted building standards are to be applied when the designated Fire Hazard Severity Zone Map has two zones that divide an existing or proposed building. Proposed modification to T19 adoption:1280.02. Local Jurisdiction Modifications in the SRAA local jurisdiction with authority to enforce building standards adopted by the State Fire Marshal as specified in Section 13145 of the Health and Safety Code may modify the degree of severity of a Fire Hazard Severity Zone designated by the State Fire Marshal. The modification may increase or decrease the Fire Hazard Severity Zone by one increment up to 200 feet from the State Fire Marshal designated Fire Hazard Severity Zone. Any modification by the local jurisdiction must be based on a site inspection of the property or through adoption by local ordinance of a fine scale map. Issue 2Title 19 section numbers are sequential without regard to Chapter. The proposed new regulations in Title 19 are adding a new Chapter 17, Section 1280. The problem is that Section 1280 is already contained in Division 1, Chapter 8, Article 5. Chapter 16 of Title 19 only contains a repeal of Sections 2300-2352; therefore I recommend that the new Chapter 17 proposed regulations be renumbered to a number higher then 2352, perhaps 2400.Wayne Maynard, Director, Ojai Valley Fire Safe Council Retired Fire Captain, Ventura Co. F.D. Previous Vice-Chair, BFO Committee, BSC Previous Chair, SoCal FPO Building Standards Committee

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. In non-wildland areas, zone edges occur based on distance to the wildland edge. Because hazard in these areas is largely determined by incoming embers from adjacent wildland, urban areas that are similar in vegetation type and housing density may have a change in FHSZ class as the distance to the wildland edge increases. Areas immediately adjacent to wildland receive the same FHSZ score as that wildland where fire originates, and the model then produces lower scores as the distance to wildland edge increases. In wildland areas, zone edges are a result of the way zones are delineated. Specifically, zones represent areas of similar slope and fuel potential. Zone boundaries divide zones based on geographic and vegetation features that align with fire hazard potential; although, at a local scale, it may appear that the immediate area is similar on both sides of the edge. The class value within a zone is based on the average hazard score across the whole zone, so areas that are in the same zone but not immediately adjacent to a local area can have an influence on the final zone classification. The proposed

regulation only designates Fire Hazard Severity Zones in the State responsibility Area. Once the regulation is effective, the identification process for the Local Responsibility Area will occur.

ID 2056, Comment: there is nothing around us for miles to burn except for some scrub weeds if you raise our fire hazard it will cost us.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Public Resource Code 4202; The State Fire Marshal shall classify lands within state responsibility areas into fire hazard severity zones. Each zone shall embrace relatively homogeneous lands and shall be based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have been identified by the department as a major cause of wildfire spread. Government Code 51178; The State Fire Marshal shall identify areas in the state as moderate, high, and very high fire hazard severity zones based on consistent statewide criteria and based on the severity of fire hazard that is expected to prevail in those areas. Moderate, high, and very high fire hazard severity zones shall be based on fuel loading, slope, fire weather, and other relevant factors including areas where winds have been identified by the Office of the State Fire Marshal as a major cause of wildfire spread.

ID 795, Comment: I would like to associate myself with the comment letter sent on January 24 from the Hacienda Improvement Association and the Hacienda FireWise/C.O.P.E. Council. Michelle Lewis+1 415 802 9927shelleylewisfilms.com

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Commenter would like to associate with ID 607

ID 864, Comment: Would I be able to view some of the comments submitted, so far? I live in Crest which is an unincorporated area of San Diego. Just want to know how any changes would affect us.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The 2007 map has this area in mostly Very High with some High FHSZ in the community interior; there is no Moderate FHSZ as suggested in the comment. There is very significant fire history in the area, including both the Laguna and Cedar Fires that burned through the community. The developed area is only about 0.5 miles in width, with wildland on all sides. Due to high burn probability and Santa Ana winds, this results in the entire urban area falling within the Very High hazard zone.

ID 2702, Comment: To Whom It May Concern: We own a number of commercial properties in the downtown area of Paso Robles. Last year, 2022, we were unable to renew our insurance coverage because of our proximity to the Salinas Riverbed that is overgrown with non-native plants, trees, and vegetation and harbors a large homeless population because it is considered a 'high risk for fire. We had to search statewide to find a policy that would cover our commercial properties. We finally found a company in Fresno, but the cost per year went up more than \$1000.00 per property and had a large deductible amount before a claim could be covered. This year, 2023, we were able to use the same insurance company, but our insurance costs increased 16%. I have contacted our City Officials and they tell me that the City only owns a portion of the riverbed and that the Federal Government owns the waterway. The past 2 years, the City was able to get permission to use goats to eat some of the brush down to help prevent fires. According to the City Officials, they are not allowed to bulldoze down any trees or shrubs even

though they are NOT indigenous to the riverbed. My family has been in this area since 1929 and I was born and raised in Paso and remember going and swimming and floating up the river that had only a few oak trees. (There are numerous photos of the riverbed that show this.... Now, it is covered with Cotton-less Cottonwood trees that were planted by homeowners who didn't want them in their yards because of the allergies they create and mess they spew two times per year in the spring and in the fall. I don't know if you are the correct agency, but PLEASE allow the appropriate department to come and assess the situation. Since the recent rains, the situation is even worse! I personally saw trees, shrubs, debris, and numerous items (tires, tents, BBQ's propane tanks, large shipping containers, trailers, propane tanks etc.) float upstream in the Salinas riverbed. As you know Kyle Doan's body (a 6 year old boy from San Miguel) has not been found after 3 1/2 months of intense searching. I have no doubt, that if they find this 6 year old's body, it will be buried under all the debris that should have been cleared out of the riverbed years ago! All this once removed, would eliminate the current fire hazard and reduce our costs for insurance and prevent our Emergency Personnel from having to use their (our) resources on our most precious resource, WATER.... Please forward this letter to all Federal Agencies that should receive it!!! And PLEASE allow the Salinas Riverbed to be cleared out of everything (trees, shrubs, and debris from the recent rains) that should not be there!!! It might also eliminate our homeless problem and the wastes that poison our water Thank you Holly Harris Driver, Manager Harris Family Properties, LLC805-610-6485

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. CAL FIRE's maps are intended to drive local planning decisions, not insurance decisions. Under Commissioner Lara's new regulation finalized in October 2022, insurance companies must provide discounts for wildfire safety actions such as community mitigation and home-hardening, which CAL FIRE's maps do not assess. In addition, insurance companies are already using risk analysis tools and models that go beyond CAL FIRE's proposed maps in determining what properties they will underwrite. Commissioner Lara's new wildfire safety regulation will help increase access to insurance by promoting wildfire safety across the state. Reducing wildfire risks throughout the state is the primary way we can make insurance more available and affordable, and our regulation is a major step towards that goal. CAL FIRE's maps support that goal through improving public education about hazard and the need for safety preparation. The Fire Hazard Severity Zone map evaluates "hazard," not "risk". The map is like flood zone maps, where lands are described in terms of the probability level of a particular area being inundated by floodwaters, and not specifically prescriptive of impacts. "Hazard" is based on the physical conditions that create a likelihood and expected fire behavior over a 30 to 50-year period without considering mitigation measures such as home hardening, recent wildfire, or fuel reduction efforts. "Risk" is the potential damage a fire can do to the area under existing conditions, accounting for any modifications such as fuel reduction projects, defensible space, and ignition resistant building construction.

ID 2367, Comment: To Whom It May Concern, I am writing in regard to the wrongness of the High and Severely High Fire Zone designation of my home and subdivision. My home address is 27951 Glade Court, Castaic, CA 91384. I have lived at my residence since 1994 and until a few weeks ago, I have never received from Cal Fire an official notification of being in either a High Severely High Fire Zone. The very recent news of this designation is highly concerning and appears to lack appropriate regulation. I am requesting that an Administrative Law Judge review and intervene by conducting a hearing on the following issues of concern: The fairness on

selection of properties throughout the State. The apparent use of two maps, one from 2007 and the other from 2022, that contradict the area as a high/severely high zone. The legality of the imposition of the uncapped insurance fees Why are tract homes in established neighborhoods with paved roads and fire hydrants now being designated as wildfire areas? Of primary concern is that the designation severely affects insurance rates and triggers County Fire to do brush inspections for tract homes which causes another tax expense. Sincerely, Rachel Samantha Davidge27951 Glade Court Castaic, CA 91384661-993-7340 Sent from Mail for Windows

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Public Resource Code 4202; The State Fire Marshal shall classify lands within state responsibility areas into fire hazard severity zones. Each zone shall embrace relatively homogeneous lands and shall be based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have been identified by the department as a major cause of wildfire spread. Government Code 51178; The State Fire Marshal shall identify areas in the state as moderate, high, and very high fire hazard severity zones based on consistent statewide criteria and based on the severity of fire hazard that is expected to prevail in those areas. Moderate, high, and very high fire hazard severity zones shall be based on fuel loading, slope, fire weather, and other relevant factors including areas where winds have been identified by the Office of the State Fire Marshal as a major cause of wildfire spread. The previous model used stock weather inputs across the state to calculate wildland fire intensity scores. The updated model will adjust fire intensity scores based on the most extreme fire weather at a given location, considering temperature, humidity, and wind speed. In addition, ember transport is being modeled based on local distributions of observed wind speed and direction values instead of using a generic buffer distance for urban areas adjacent to wildlands.

ID 2000, Comment: THIS IS NOTHING MORE THAN A MONEY GRAB BY THE FIRE DEPTS, I GUESS NOT ENOUGH MONEY FOR THE FIRE DEPT EMPLOYEES WHO SLEEP MORE ON THE JOB THEN FIGHTING FIRES, THIS LATEST UNFAIR TAX SHOULD DEFINITELY BE PUT ON THE COUNTY BALLOT FOR A LEGITIMATE VOTE. THIS REALLY TURNS ME OFF FROM A FAVORABLE VIEW OF THE DEPT. WILL BE VOTING AGAINST ALL BENEFITS FOR THIS DEPT IN THE FUTURE, I AM ONLY ONE OF MANY WHO FEEL THIS WAY.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Public Resource Code 4202; The State Fire Marshal shall classify lands within state responsibility areas into fire hazard severity zones. Each zone shall embrace relatively homogeneous lands and shall be based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have been identified by the department as a major cause of wildfire spread. Government Code 51178; The State Fire Marshal shall identify areas in the state as moderate, high, and very high fire hazard severity zones based on consistent statewide criteria and based on the severity of fire hazard that is expected to prevail in those areas. Moderate, high, and very high fire hazard severity zones shall be based on fuel loading, slope, fire weather, and other relevant factors including areas where winds have been identified by the Office of the State Fire Marshal as a major cause of wildfire spread.

ID 598, Comment: Hello, my name is Rebecca Brown and I live in Amador Pines, which is about 3500 feet up. Listening to you, Sir. I wish that we were possible in Amador Pines to have had people from Cal Fire. To come and help all of the people who are living there. Learning and

and responding to make a difference so that we aren't going to be. Routing all the way down like a. That one. Fire that went and everybody got burned up as they were trying to get away. You know, like, so I can't remember the name or time but. I really don't know why. We have not had. Very good relationship with California. And our local department to make sure that we made these, we could make these things change. That we could have the support. Instructions, understanding, et cetera. I don't know about the funding and the money about it, but we need to we need to address this. It's. There are people who have been trying to take trees down, but that still doesn't help us. For the rest of the issues so. Stand up please. Help us. It's been too long to have nothing going on, right? Also, this is not a very good timing for people who want to have information from you. I'm disappointed that this is not a place for a bunch of people can come because they're not. They're at work or they're coming home or they're good kids. I wish she would have an opportunity with more opportunities for us to be there doing this work with you. So thank you for coming and we hope we can go further.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Recent fires (through 2020) do factor into burn probability in the model, as they reflect trends in fire likelihood within similar climate and fuel groupings. Like other temporary mitigations such as fuel treatments, the effect of wildfires on fuel loads is limited due to vegetation regrowth or type conversion. Because some of the most critical fire safety regulations involve construction materials and methods, which are influential over the entire life of a structure, FHSZ utilizes fuel conditions that reflect the maximal hazard condition likely to occur over a 30-50 year time horizon. The Fire Hazard Severity Zone map evaluates “hazard,” not “risk”. The map is like flood zone maps, where lands are described in terms of the probability level of a particular area being inundated by floodwaters, and not specifically prescriptive of impacts. “Hazard” is based on the physical conditions that create a likelihood and expected fire behavior over a 30 to 50-year period without considering mitigation measures such as home hardening, recent wildfire, or fuel reduction efforts. “Risk” is the potential damage a fire can do to the area under existing conditions, accounting for any modifications such as fuel reduction projects, defensible space, and ignition resistant building construction.

ID 925, Comment: To: Whom it may concern From: Judy Rose Re: Comment on the Fire Hazard Severity Zone for Santa Cruz, CA I am interested in the possibility of creating a separate evacuation zone for Ocean St. Ext split off from the Paradise Park zone, for the following reasons. I would like to bring to your attention to the difference in the housing density between Paradise Park and the homes on Ocean St. Ext. I would identify the 280 (approx.) homes in Paradise park, as being very close together surrounded by a forest. The homes, in Paradise Park, are on flat terrain surrounded by large Redwood trees with some of the homes adjacent to the San Lorenzo river that can be subject to flooding. Some of the 68 (approx) homes on Ocean St. Ext, especially those that are on the river side of the road, are surrounded by acres of land that I would identify as *non-wild land. There are a few homes on an uphill slope and others on flat land with varying size lots. On Ocean St. Ext. there is agricultural land, pastureland, slopes and vegetation that is very different than the landscape of Paradise Park. Several of us have experienced difficulties in the evacuation process, both in fire and flooding. These evacuation notices were relevant to Paradise Park but premature and ultimately not relevant to Ocean St. Ext. And yet, we are subject to the same parameters that apply to Paradise Park. There have been consequences for several of us. We have been cancelled by our insurance companies, based on the fact that we live in a zone that had to be evacuated, when we were safe in our homes. I would

like to know if this situation could be mitigated in the future by creating an Ocean St. Ext. zone that was split off from the Paradise Parl zone. Is that something that could be possible? Thank you for your consideration Respectfully yours, Judy Rose 2125 Ocean St. Ext. Santa Cruz, CA 831 325 6891 jrose@cruzio.com Notes from the video “What are Fire Hazard Severity Zones “Zones aim to capture patches of similar fire potential or fire environments. Fire hazard severity zone classes are ultimately applied across an entire zone. The data input for developing the zone boundaries include slope and vegetation acres that have similar slope and flammability are aggregated or grouped into zones.” **“Non-wildland areas include urban, agricultural and barren lands and water or wetlands.”*

Response: The proposed regulation only designates Fire Hazard Severity Zones (FHSZ) in the State Responsibility Area (SRA). Local ordinances and evacuations are a function of the local jurisdiction, and the Office of the State Fire Marshal does not regulate local ordinances.

ID 1741, Comment: We strongly oppose this! Americans are paying enough! Sent from my iPhone

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Public Resource Code 4202; The State Fire Marshal shall classify lands within state responsibility areas into fire hazard severity zones. Each zone shall embrace relatively homogeneous lands and shall be based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have been identified by the department as a major cause of wildfire spread. Government Code 51178; The State Fire Marshal shall identify areas in the state as moderate, high, and very high fire hazard severity zones based on consistent statewide criteria and based on the severity of fire hazard that is expected to prevail in those areas. Moderate, high, and very high fire hazard severity zones shall be based on fuel loading, slope, fire weather, and other relevant factors including areas where winds have been identified by the Office of the State Fire Marshal as a major cause of wildfire spread.

ID 2229, Comment: Cal Fire RE: Fire Hazard Severity Zone We believe the Administrative Law Judge should intervene and there should be a hearing on the following: The reasoning and fairness on the selection of the properties throughout the State. The use of 2 maps, one from 2007 and the other from 2022 that contradict each other. The legality of the imposition of this fee and how it was adopted in State Legislature. We find it awfully fishy we are told “well you know this fee was imposed in 2007 but we just haven’t charged you yet. Why are tract homes in established neighborhoods, with paved roads and fire hydrants now being reversed in decision as wildfires areas. Our home has been here over 40 years and we have resided here for 36 of those years. Since then more tracks have been built and has pushed the fire threat further away from our home. Why are we now considered a high fire area? With this new designation this is going to create extremely high insurance rates. As many insurance companies have already left California, this will make it even harder to obtain and afford coverage. We feel, that due to the States financial position, this is just a way to create more revenue. Please keep in place the enforcement we already have. Thanks for your consideration Mark & Joan Brandt 31468 Arrow Point Dr Castaic, CA 91384

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. A 2 km grid of climate data covering the years 2003-2018 is being used in the update. The previous model used stock weather inputs across the state to calculate wildland fire intensity scores. The updated model will adjust fire intensity scores based on the most extreme

fire weather at a given location, considering temperature, humidity, and wind speed. In addition, ember transport is being modeled based on local distributions of observed wind speed and direction values instead of using a generic buffer distance for urban areas adjacent to wildlands. Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are to damage. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk.

ID 52, Comment: Hello – Just letting you know that San Luis Obispo County is omitted from the county maps showing the SRA Fire Hazard Severity Zones on this web page:<https://osfm.fire.ca.gov/fire-hazard-severity-zones-maps-2022/> If you have it handy, would appreciate you forwarding it to me or letting me know when it's posted. Also, the telephone number listed on the maps 916-633-7655 does not seem to be working. Thank you - Brent Brent Burchett Executive Director San Luis Obispo County Farm Bureau 4875 Morabito Place, San Luis Obispo, CA 93401 (805) 543-3654 | bburchett@slofarmbureau.org

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Map was placed on the website 12/20/23.

ID 207, Comment: Where is meeting being held at COC on Saturday January 14th at 10 am.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Meeting was held at College of the Canyon on 1/14/23 at 10AM. Meeting address is 26455 Rockwell Canyon Road, Room 258 Santa Clarita, 91355

ID 901, Comment: Need prevention, mitigation, and hardening tracking at parcel level in high FHSZ. WUI – Fire Department and GIS and Assessor. Need correlation tracking of FHSZ and insurance premium increases, cancelation, non-renewals. Need better access to state resources for resilience, mitigation, prevention. Comments submitted at all hearings should be published by comment periods expire for each jurisdiction.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Public Resources Code 4202 requires the State Fire Marshal to classify lands within state responsibility areas into fire hazard severity zones. Each zone shall embrace relatively homogeneous lands and shall be based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have been identified by the department as a major cause of wildfire spread. Public comment on the map was received under Public Resources Code 4203 which requires the State Fire Marshal to notify each County Board of Supervisors and hold a public hearing in each county with a Fire Hazard Severity Zone designation in the State Responsibility Area, with an additional public hearing added in Sacramento County. When the office of the State Fire Marshal provided public comment periods and extensions, all requirements of the Administrative Procedure Act (APA) were followed.

ID 3739, Comment: Dear representative, Do you have a list of house addresses in fire zone areas that you can share ?Thank you ,Best-- Anahit Hovhannisyan Unmatched Solutions for Supply Chain Issues 398 Laguna Terrace Simi Valley, California, 93065 Email: anahit@quantumtechnology.us.com Learn More About Us

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. No, but the map does allow the public to search by address and zoom into that location to identify which zone a property is in.

ID 672, Comment: Letter from city is forth coming, city of Thousand Oaks is studying new map and will provide comment.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Public made comment that a letter would be forthcoming.

ID 419, Comment: To State Fire Hazard Department, I am an owner at Village in the Park which is across the street from San Bruno Mountain State Park. I am concerned about the Eucalyptus trees located across the street from us in San Bruno Mountain State Park. The current fire map has not been updated since 2007 and our insurance company considers this area a red fire hazard zone. Our rates have skyrocketed. The city has been alerted on several occasions and the problem continues. I believe it is time for the State to get involved. We need a fire break to reduce the fire hazard as well as the area on the mountain at Pointe Pacific. Many of us are older adults and are afraid of living so close to these flammable trees. We are on fixed incomes, and the insurance rates are difficult for us. I would like to see the State and County take responsibility for providing the necessary adjustments, the fire break, to reduce our risk. We pay taxes. We should be safe. Thank You, Fran L Cherlow MA, LMFT 254 Greenview Dr Daly City CA 94014fcherlow@gmail.com

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Over the past few years, CAL FIRE has been building the new model for a 2022 update. The latest technologies will be used in the mapping and will include new factors now available including land use changes, recent fire history, new significant wind event data, as well as a model that is more spatially detailed.

ID 1795, Comment: I have lived in Paso Robles for 32 years. It is not a fire hazard, maybe the county areas .. but not city areas! This is a money grab. Brenda Christian Sent from my iPhone

Response: CAL FIRE adjusted FHSZ in this area, where necessary to better reflect current land use and wildland fuels.

ID 569, Comment: Alright. Yeah, I'm John haschak. I'm third district supervisor for medicinal county. I live southwest of Willets. And, you know, I think that this is a great forum for having this discussion. Unfortunately, you know, with the storm we're having, I think a lot of people that haven't come out, but hopefully they'll they'll be making their comments publicly through the website and all the other avenues that you presented. One question I have is is about, you know the mapping and when I looked at the map and looked at the area of the third district, it seemed like some of the areas didn't really correspond. And I was wondering because it's coming from Sacramento and these computer models and everything. I was wondering what input does local Cal Fire have on on these maps and is it going to change because you guys know much better than? Probably the computer model does in a lot of cases. So how how? How is that going to work with your input? Yeah. All. It's worth about. OK, thank you.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The Office of the State Fire Marshal is reassessing the map based on comments received from the public. The Office of the State Fire Marshal followed PRC 4203(b) which requires that a public hearing be held in each county with a designated Fire Hazard Severity Zone.

ID 2489, Comment: Hi, my name is John Townsville. I live in San Diego County. Please give me a call back at 1-619-888-6004. I would like to explain to you why the new proposed fire hazard zone map is incorrect for our neighborhood. Thank you very much.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Public comment on the map was received under Public Resources Code 4203 which requires the State Fire Marshal to notify each County Board of Supervisors and hold a public hearing in each county with a Fire Hazard Severity Zone designation in the State Responsibility Area, with an additional public hearing added in Sacramento County. When the office of the State Fire Marshal provided public comment periods and extensions, all requirements of the Administrative Procedure Act (APA) were followed.

ID 2280, Comment: The current proposal for the Updated Fire Hazard Severity Zone Map is irresponsible and poorly constructed, hidden behind potentially questionable methodology and modeling. This is outrageous since the proposed map has harmful side effects for many current homeowners but there is no evidence that these concerns were considered. You ask for public comment, yet there is no indication that those comments will have influence. It is clear that the public has no agency in the process and that the outreach surrounding this change is simply perfunctory: without science, without public input, and with little merit. What is the point of the new map? How will it improve our life in California? There are several nice platitudes in the news release but no details. For example, it states so that the public can take steps to prevent and prepare for wildfire. Clearly homeowners are to be blamed for and will pay the price for not preventing lightning and PG&E from starting fires. What is the sound science basis and methodology after years of work? Using the term science does not make it so, just makes it a meme. We are given no details to support the science claim or acknowledgment that all models are wrong (George Box). One glaring deficiency is the historical precedence for fire in an area. This is foundational to any predictive capability but you used only the years 1991—2020 out of a potential history of 140 years. This would make anyone with even the mildest understanding of Bayesian probability deeply ill and causes areas with no history of wildfire to be labeled Very High. The current proposed map can not be taken seriously when one house is in a Very High zone while less than 100 yards away, another house with identical physical and flora environments, is in a less serious zone. How is this science based? In fact, where are the uncertainty estimates for your model? If you do not have them, it is not science. We will not even ask about peer review. The public relations campaign surrounding the updated map was more about opacity than transparency. We were given limited information and no opportunity for discussion. Information on public meetings stated that its sole purpose was to accept public comments. How is that agency? The one meeting scheduled for Santa Cruz County was held on an extremely stormy day when the public was told not to travel. The meeting was not rescheduled. One meeting per county with no ability for discussion is not exactly outreach. Superficial agency is not true agency. This is a hazard map in more ways than one. It represents an insurance cancellation hazard for existing homeowners that wasn't present before. Much was made of constructing a distinction between and but those arguments were often contradictory and senseless. Saying that these zones are independent of insurance risk assessment is like saying guns don't kill people. It is artificial and meaningless because the OSFM and CalFire are insulated from the effects that individuals will bear, including damaged property values. Although the proposed map puts us in a Very High zone, we should be more concerned about our toaster oven causing damage than a wildfire. There is no evidence that this new map, or its

process, will allow CalFire to more effectively handle wildfires, which is their primary function. This exercise is all about allowing homeowners and individuals to be blamed for wildfires and provides no support for actually controlling wildfires. It is merely a placebo with no other discernible goal. It is presented as transparent and scientific but this is a public relation inspired illusion to support the insurance industry and gentrification of the Wildland Urban Interface. Some of this may be unwitting but none-the-less true. CalFire provides a significant level of comfort to us for where we live: professional, informative, caring, and well engaged with their community. This process is the opposite of all those qualities. Virgil and Mary Beth Champlin PO Box 901 Brookdale CA 95007-0901831-338-4352cc: Gail Pellerin, California Assembly, 28th District John Laird, California Senate, 17th District Santa Cruz County Board of Supervisors

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Public Resource Code 4202; The State Fire Marshal shall classify lands within state responsibility areas into fire hazard severity zones. Each zone shall embrace relatively homogeneous lands and shall be based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have been identified by the department as a major cause of wildfire spread. Government Code 51178; The State Fire Marshal shall identify areas in the state as moderate, high, and very high fire hazard severity zones based on consistent statewide criteria and based on the severity of fire hazard that is expected to prevail in those areas. Moderate, high, and very high fire hazard severity zones shall be based on fuel loading, slope, fire weather, and other relevant factors including areas where winds have been identified by the Office of the State Fire Marshal as a major cause of wildfire spread. In non-wildland areas, zone edges occur based on distance to the wildland edge. Because hazard in these areas is largely determined by incoming embers from adjacent wildland, urban areas that are similar in vegetation type and housing density may have a change in FHSZ class as the distance to the wildland edge increases. Areas immediately adjacent to wildland receive the same FHSZ score as that wildland where fire originates, and the model then produces lower scores as the distance to wildland edge increases. In wildland areas, zone edges are a result of the way zones are delineated. Specifically, zones represent areas of similar slope and fuel potential. Zone boundaries divide zones based on geographic and vegetation features that align with fire hazard potential; although, at a local scale, it may appear that the immediate area is similar on both sides of the edge. The class value within a zone is based on the average hazard score across the whole zone, so areas that are in the same zone but not immediately adjacent to a local area can have an influence on the final zone classification.

ID 287, Comment: In my opinion rural unincorporated areas have been in monitored in history. The lands themselves pose no fire hazard safety issues, and mandates will not be the answer. It is purely human error. More over the years caused by urban folk with fantasies of country living moving in yet do not have the sense or the knowledge to live in that environment safely. It pure human error, idiosy, and ignorance that causes fires wether it be in a country environment or not. I do not need another government official monitoring how I live my life because you all can't educate our society of the dangers or their behaviour .Leave us rural folk alone. Thank you. Sent from my iPhone

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Public Resources Code sections 4202 and 4203 require the State Fire Marshal to classify and designate the lands within the State Responsibility Area.

ID 2263, Comment: Re: Fire Hazard Severity Zones (FHSZ) Greetings State Fire Marshall: Please do not support any laws, regulations, rules or customs that are of a one size fits all variety. It will end up destroying property unnecessarily without a wildfire related benefit. Many times the property owners really do know the peculiarities, strengths and weaknesses of their properties. I am concerned about situations where people with limited training without the breadth of experiences come by to do assessments without a well-rounded knowledge base. Sometimes there are more tools available than their training takes into account. Sometimes there are unsupported prejudices held by those with insufficient knowledge or experiences. We lived through the Camp Fire. We sheltered in place at the ranch and brought the horses in the house as necessary. Barricade and other fire fighting foams helped secure our place as well as its good design. Leave our landscaping alone. It is necessary for more than comfort and beauty. All Good Things, Teri Faulknerterifa27@gmail.com

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Recent fires (through 2020) do factor into burn probability in the model, as they reflect trends in fire likelihood within similar climate and fuel groupings. Like other temporary mitigations such as fuel treatments, the effect of wildfires on fuel loads is limited due to vegetation regrowth or type conversion. Because some of the most critical fire safety regulations involve construction materials and methods, which are influential over the entire life of a structure, FHSZ utilizes fuel conditions that reflect the maximal hazard condition likely to occur over a 30-50 year time horizon. The Fire Hazard Severity Zone map evaluates “hazard,” not “risk”. The map is like flood zone maps, where lands are described in terms of the probability level of a particular area being inundated by floodwaters, and not specifically prescriptive of impacts. “Hazard” is based on the physical conditions that create a likelihood and expected fire behavior over a 30 to 50-year period without considering mitigation measures such as home hardening, recent wildfire, or fuel reduction efforts. “Risk” is the potential damage a fire can do to the area under existing conditions, accounting for any modifications such as fuel reduction projects, defensible space, and ignition resistant building construction. The WUI building codes (California Building Code (CBC) Chapter 7A) reduce the risk of embers fanned by wind-blown wildfires from igniting buildings. The codes for roofing, siding, decking, windows, and vents apply throughout all state responsibility area regardless of the fire hazard severity ranking. Ember-resistant building materials can be found at:

<https://osfm.fire.ca.gov/divisions/fire-engineering-and-investigations/building-materials-listing/>

ID 2353, Comment: March 25, 2023 California Department of Forestry and Fire Protection Office of the State Fire Marshal C/O Scott Witt P.O. Box 944246 Sacramento, CA 94244-2460 fhszcomments@fire.ca.gov Via E-mail Re: Proposed Revisions to Fire Hazard Severity Zone Designations Dear Mr. Witt, Pursuant to the Notice of Proposed Rulemaking Action (NOPA or Notice) issued December 16, 2022 and the subsequent Notice of Additional Written Comment Period, the Vineyard Valley View Property Owners, the homeowners corporation for the Vineyard Valley View development ("VVVPO") submit these comments regarding the proposed revisions to the Fire Hazard Severity Zone Designations (FHSZ Designations) and ratings in the State Responsibility Area (SRA). The Vineyard Valley View development is one of the largest planned communities in Northern Sonoma County established over 60 years ago. We are a rural residential district at the northern end of Alexander Valley near the unincorporated town of Geyserville; the VVVPO development area is approximately 2000 acres and contains nearly 120

homes. We wish to express our specific concerns over impacts of the FHSZ map revisions which we believe will have substantial consequences both favorable and possibly unfavorable on the long term resilience of our community. We request OSFM consideration to mitigate several of the potential consequences of the updated maps in our area as described below. We support the efforts of the legislature, the Office of the State Fire Marshall and all CAL FIRE personnel to safeguard our communities, raise awareness, support and stimulate community action to reduce fuel loads. However, we are concerned that the maps will be used for unintended purposes to the detriment of our residents and nearby businesses. Based on recent remapping of statewide fire hazard maps (November 2022) by CAL Fire, the entire VVVPO community is now classified as a Very High Fire Hazard Severity Zone. Previously 75 homes in the community (63%) were classified as Moderate Hazard; 45 homes (37%) were in the Very High category. This is a substantive change (100% in the Very High category) that may likely have impacts for many property owners, businesses and Sonoma County, including: -fire insurance coverage (higher policy rates/costs) - loss of fire insurance policy coverage -reduced ability to obtain mortgages to finance home purchases - lower property values/appraisals for homeowners - lower assessments for County property tax revenues. For the last two years alone, our community has been actively engaged in fire hazard mitigation. We have spent and obtained grants of hundreds of thousands of dollars to reduce the fuel load on our land and other mitigation strategies. We enacted a special ordinance to collect a special tax on VVVPO and adjacent properties which over the next 8 years will additionally contribute several hundred thousand dollars of community-wide funds to improve fire safety and mitigate risks. We are active participants in NE Geyserville COPE, we adopted a Community Wildfire Protection Plan (CWPP) approved by the Northern Sonoma County Fire District and county officials, and we have been certified as a FIREWISE USA community. In short we have been actively engaged in hazard and risk reduction consistent with the stated intent of fire hazard mapping: "to enhance public safety, protect resources, identify and implement measures that will reduce the potential for losses." The statute (2021 Assembly Bill 9) mandating updating fire hazard severity zone maps includes an assessment that this statute does not have significant cost impacts on homeowners. Anecdotal statements from public officials characterize these maps as identifying "hazards" not "risks". We are doubtful that there are no significant cost impacts on housing and that anecdotal messages will carry any weight on third party decision makers- insurance companies, mortgage lending companies and appraisers. We are seeking the following actions from OSFM, the Insurance Commissioner, legislators and other public officials: a. formal provisions in the regulations that prohibit the entities mentioned above from using the maps to redline an area, charging unreasonable insurance rates increases, dropping insurance coverage, re-appraising properties; b. assurance that higher severity designations will result in prioritizing and enhanced funding for fire prevention services in higher hazard locations; c. a formal proviso in the regulations that a "hazard" zone designation by definition does not account for active risk mitigation work to create defensible space, fuel reduction, vegetation management, hardening of structures and emergency road access/egress within communities and individual parcels; d. create a CWPP area overlay to the FHSZ maps to identify communities that have adopted CWPP action plans approved by the local fire district to mitigate hazards and reduce risks. This would reinforce the efforts of entire neighborhoods and individual property owners to take steps to create defensible space or harden their buildings. Respectfully submitted on behalf of Board of Directors: Lisa Downes, Larry Heiges, James Olson, Steve Sachs, Ruth Weizman VINEYARD VALLEY VIEW PROPERTY OWNERS cc:

Senator Mike McGuire Assembly Member Jim Wood Honorable Ricardo Lara, Insurance
Commissioner Supervisor James Gore

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. Separate statutory mandates outside of the OSFM's regulatory scope require that all property in High or Very High FHSZs in the SRA comply with Civil Code 1102.6f, real estate disclosures Assembly Bill 38 (Wood, Chapter 391, Statutes of 2019). These disclosures are known as "AB 38 Defensible Space Inspections," and are not required for property in Moderate FHSZs in the SRA. As a result of the proposed regulations, the boundaries of Moderate, High, or Very High FHSZs in the SRA may shift, altering which properties are required to comply. However, every FHSZ in the SRA is already required to comply with the underlying defensible space requirements of AB 38 located in PRC Section 4291.

ID 452, Comment: Dear Gentilepersons: I am submitting my criticism of (and suggestions for improving) the veracity of the revisions Cal Fire is proposing for the official map of Fire Hazard Severity Zones in California. As a homeowner who has invested substantially in fire hardening on our property to mitigate our wildfire risk, as have many of our immediate neighbors, with similar efforts also taken across our community, I believe the fire hazard maps you are proposing for our community do not reflect the reality of any of this work or the real risk on the ground. On our property, for example, we have installed, among other mitigations and defensive measures, a Frontline Ignition Prevention System to address ignition by wind-blown embers. This sort of system may not yet be widespread, but there have been in our community widespread risk mitigations that the hazard maps fail to reflect, or even acknowledge! Public involvement and ground truthing has been inadequate for evaluating real risk. Hazards are one thing; mitigation efforts reduce real risks. These include very extensive (and expensive) fire hardening projects by SDGE, fire districts and individual homeowners across San Diego County. Enormous mitigation efforts advised by Cal Fire and other fire safety entities in Valley Center since the 2003/2007 fires have greatly reduced the risk of wildfire destruction – in some areas much more so than others. These risk reductions, and variations, are NOT reflected on the hazard maps. Rather, compared to the previous maps the new hazard maps "show" erroneously that extensive risk mitigation efforts have INCREASED hazard levels– the opposite of what fire safety agencies have advised the public for the last 20 years. At the very least there should be accompanying maps showing areas where risk mitigation efforts have been significant. While recognizing wildfire hazard is critically important to funding and planning; recognizing risk mitigation is also critically important to informing how these very influential hazard maps should be interpreted, for example, by insurance companies as they set homeowner insurance rates. Public involvement and ground truthing is necessary to refine and better reflect the real RISKS in different sections of Valley Center. Thank you for your consideration, Lael Montgomery13678 McNally Road Valley Center, CA January 16, 2023

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The Fire Hazard Severity Zone map evaluates "hazard," not "risk". The map is like flood zone maps, where lands are described in terms of the probability level of a particular area being inundated by floodwaters, and not specifically prescriptive of impacts. "Hazard" is based on the physical conditions that create a likelihood and expected fire behavior over a 30 to 50-year period without considering mitigation measures such as home hardening, recent wildfire, or fuel reduction efforts. "Risk" is the potential damage a fire can do to the area under existing

conditions, accounting for any modifications such as fuel reduction projects, defensible space, and ignition resistant building construction.

ID 2933, Comment: To FHSZ staff, The Tiburon Fire Protection District was founded in 1941 and was never SRA. An Area shown on this latest FHSZ map and the previous map show areas of the Tiburon Fire District's boundaries as SRA.... this is incorrect. I emailed this group on December 19, 2022 and received a reply on Dec 22, 2022 that did not address the issue other than direct me to comment. Therefore, this is my second attempt to comment that the SRA map shall not include any Tiburon Fire District area. Please reply to this issue. Respectfully, Michael Lantier Fire Marshal Tiburon Fire Protection District 1679 Tiburon Blvd. Tiburon, CA 94920 (415) 435-7200 Station 11 (415) 435-7207 Desk (415) 435-7205 fax www.tiburonfire.org mlantier@tiburonfire.org Check us out on Nextdoor Sign up for the TFPD Newsletter! An email message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential, and exempt from disclosure under applicable law. Access to this email by anyone other than the addressee is prohibited without prior approval.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The area in question is indeed State Responsibility Area (SRA). It has been so since the 2000 5-year review. SRA reviews are conducted on 5-year cycles. CAL FIRE has cataloged the geospatial data of each 5-year review change since 1995. In reviewing the data it appears the area in Tiburon became SRA during the 2000 review. The change code (the reason for the change in responsibility area) is noted as 'USE - landuse, typically loss of watershed value due to a combination of crops and development.' This coding is normally, as is implied, for loss of watershed value and a reason for areas leaving SRA. One can infer that, due to this coding, during the 2000 review this area was cited as having watershed value that meets the thresholds for coming under state responsibility. Unfortunately no other documentation can be found around this change. SRA is a standalone dataset. The current version can be viewed here and downloaded here. Upon review you will see that there is SRA in the Tiburon Fire District. See image below, where yellow is SRA: The next 5-year review is scheduled to take effect in 2025. The Pre Fire Planning program will solicit changes from CAL FIRE units and contract counties through 2024 to take effect the following year.

ID 789, Comment: Wondering why my home, 250 Clarence Lane, Meadow Valley, in fact most of Meadow Valley is high risk when the fire department is a mile from my home? Why aren't we under local responsibility, we have a fire department, and absolutely NO CAL FIRE personnel or equipment in Meadow Valley. We can't force the Feds to log or manage the forest behind our home, so let them pay the higher insurance premiums. Melissa Hays Sent from Melissa Hays- iPhone

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The Board of Forestry and Fire Protection (Board) classifies land as State Responsibility Area. The legal definition of SRA is found in the Public Resources Code Section 4125. The Board has developed detailed procedures to classify lands as State Responsibility Area. Lands are removed from SRA when they become incorporated by a city, change in ownership to the federal government, become more densely populated, or are converted to intensive agriculture that minimizes the risk of wildfire. While some lands are removed from SRA automatically, the Board typically reviews changes every five years.

ID 556, Comment: Memo to: Cal Fire at FHSZcomments@fire.ca.gov. From: David Poe Treasurer of HOA and Homeowner with Mary Poe Subject: Fire Hazard Severity Zone Map Date: January (xx), 2023 As homeowners at 5100 Burnham Ranch Road, Santa Rosa, CA 95404, we are concerned about your proposed Fire Hazard Severity Zone Map where you are proposing that our address and the entire 320 acres of Summit View Ranch be included in the Very High Hazard Severity Zone (Red). The reason for our concern is that this change could negatively impact many aspects of our home ownership including property valuation, ability to sell our property, and cost of property insurance. We understand that your maps evaluate “Hazards” based upon the physical conditions that create the likelihood of fire behavior over a 30-50 year period, which you have summarized as the “likelihood of a damaging event”. Please let us summarize why we think that the Hazards related to our property do not justify such a high assessment of severity. This will be followed by questions that we have for you to help us better understand your assessment methodology and preliminary conclusions: Hazard factors related to my residence and its surroundings: 1. We are part of a homeowners association (Summit View Ranch HOA) which represents 21 homeowners on a 320-acre parcel (the Ranch, which continues to run cattle, was developed into 21 homeowner sites in 1979). Collectively, we manage these 320 acres to reduce hazards, with a goal of making the entire 320 acres defensible space. We do so by having regular work parties whose activities include cutting flammable trees (e.g., Bay Laurel trees), eliminating flammable bushes (e.g., blackberry bushes), and limbing up trees on the ranch (mostly indigenous Live Oak trees). In 2010, we initiated a relationship with Carleone Safford, then Coordinator of Fire Safe Sonoma, and have taken advantage of their Chipping Program every year since. 2. The Ranch has been a cattle ranch for at least 100 years, and we run about 60-80 head of cattle on the ranch every winter and spring to keep grasses low. 3. The Ranch is bordered by other ranches, principally the Cook Ranch and the Jacobs Ranch (which is now the North Sonoma Mountain Regional Park). These ranches are also principally open grazing areas. 4. Summit View Ranch benefits from frequent fog layers coming up from the Petaluma Gap to our west (the prevailing wind pattern). We find that this keeps our humidity level relatively high compared with other parts of the County. Humidity and other weather historical information can be found at <https://www.wunderground.com/dashboard/pws/KCASANTA2740/table/2022-08-18/2022-08-18/monthly> 5. We have relatively easy and open access for fire suppression including having 6 fire hydrants (mapped and tested/maintained annually), having 2 miles of paved roads with easy access/ turnaround by fire trucks, and having multiple egress routes in case of an emergency. We also maintain an extensive water system which now includes an 80,000 gallon storage capacity accessible by local fire departments. We are also only 2 miles from Fire Station # 8. The consequence of the above Hazard factors is that we have never, in the last 100 plus years and as far back as anyone can remember, suffered any damage from the wildfires that have occurred in our region. There are family members living on our Ranch today that were part of the original family that purchased the land as a cattle ranch over 100 years ago that can attest to this fact. Please note that your map shows us as a very small “finger” or “peninsula” of red, surrounded on three sides by less severe ratings and can easily be converted to moderate! We also invite and urge you to visit our property to add your personal perspective to your decision-making on the proposed map. Having now summarized the hazards related to my property and our surroundings, here are our questions that we wish to propose to your organization: 1. Are the Hazard factors described above ones that you use in your modeling and data input efforts to

determine an area's severity zone? 2. If not, could you describe what other factors that you use that we have not addressed above? 3. Will you please explain and forward to us the data on weather patterns, humidity, wind, specific vegetation and fire history that was used to place our 320-acre ranch in the extreme fire hazard range? 4. What additional information would you like to receive from us to better help you understand our hazard factors that lead to your assessment of our severity factor? We appreciate your holding public hearings on this subject (which we personally participated in) and in your commitment to responding to our questions. Please see attached letter as our homeowner response to your Fire Hazard Severity Zone Map. Thank you for considering our input. David and Mary Poe David Poe 707-529-5842 davidpoeus@gmail.com

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The fire hazard severity model for wildland fire has two key elements: probability of an area burning and expected fire behavior under extreme fuel and weather conditions. The zones reflect areas that have similar burn probabilities and fire behavior characteristics. The factors considered in determining fire hazard within wildland areas are fire history, flame length, terrain, local weather, and potential fuel over a 50-year period. Outside of wildlands, the model considers factors that might lead to buildings being threatened, including terrain, weather, urban vegetation cover, blowing embers, proximity to wildland, fire history, and fire hazard in nearby wildlands. FHSZs are not a structure loss model, as key information regarding structure ignition (such as roof type, etc.) is not included. CAL FIRE used the best available science and data to develop, and field test a model that served as the basis of zone assignments. The model evaluated the probability of the area burning and potential fire behavior in the area. Many factors were included such as fire history, vegetation, flame length, blowing embers, proximity to wildland, terrain, and weather. A 2 km grid of climate data covering the years 2003-2018 is being used in the update. The previous model used stock weather inputs across the state to calculate wildland fire intensity scores. The updated model will adjust fire intensity scores based on the most extreme fire weather at a given location, considering temperature, humidity, and wind speed. In addition, ember transport is being modeled based on local distributions of observed wind speed and direction values instead of using a generic buffer distance for urban areas adjacent to wildlands.

ID 3796, Comment: unable to paste comment in due to formatting, have provided backup documentation for comment, ID 3796.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The fire hazard severity model for wildland fire has two key elements: probability of an area burning and expected fire behavior under extreme fuel and weather conditions. The zones reflect areas that have similar burn probabilities and fire behavior characteristics. The factors considered in determining fire hazard within wildland areas are fire history, flame length, terrain, local weather, and potential fuel over a 50-year period. Outside of wildlands, the model considers factors that might lead to buildings being threatened, including terrain, weather, urban vegetation cover, blowing embers, proximity to wildland, fire history, and fire hazard in nearby wildlands. FHSZs are not a structure loss model, as key information regarding structure ignition (such as roof type, etc.) is not included. Public Resources Code 4202 requires the State Fire Marshal to classify lands within state responsibility areas into fire hazard severity zones. Each zone shall embrace relatively homogeneous lands and shall be based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have

been identified by the department as a major cause of wildfire spread. Public comment on the map was received under Public Resources Code 4203 which requires the State Fire Marshal to notify each County Board of Supervisors and hold a public hearing in each county with a Fire Hazard Severity Zone designation in the State Responsibility Area, with an additional public hearing added in Sacramento County. When the office of the State Fire Marshal provided public comment periods and extensions, all requirements of the Administrative Procedure Act (APA) were followed.

ID 1967, Comment: March 27, 2023 To: CalFire / fhszcomments@Fire.ca.gov Re: Fire Hazard Intensity Upgrades This is absolute BS. This area hasn't had a significant major Wildfire for well over 150 years. I can barely afford my homeowners / fire insurance policy now. The State of CA is driving us poor people to live in the streets or move out of the State completely. I can't afford this crap anymore. This process was done secretly and against the people to rip us off. The State Democrats are getting kickback money from the insurance companies already. This more EXTORTION from the citizens of CA. My overpriced HMO through CalPERS is nearly \$800.00 a month. So much for the Affordable Healthcare Act, formerly Hillary-care, then Obama-care, which is more Democrat BS breaking the bank to get kickback money from the HMO's too. Bryan Meder, Retired / Disabled CA Police Officer PO Box 1611 Lucerne Valley, CA 92356-1611 We had no notice of Lucerne Valley's SRA upgrades from Cal-Fire prior to its "hearing" in San Bernardino – far from the area affected. The San Bernardino County Board of Supervisors and Fire Chief didn't know about it until late in the process. It wasn't known until Cal Fire asked the County for a meeting place for a "hearing" – with no notice to the public – and thus no attendance. We didn't even know about SRAs until residents were taxed a few years ago before the tax/fee was rescinded. For years we have advocated rescinding our SRA designation because it is our opinion based on observation that our environment does not qualify for any form of 'wildland' inclusion. It's also our opinion that use of Highways 18 and 247 as the southern boundary is arbitrary and has no credibility because our observation is that vegetation and its density are no different for over 1 mile either side of the highways – all the way south to the railroad tracks or BLM/USFS boundaries. We understand now that SRA boundaries are up for review every 5 years – with us never knowing about it nor 'what determines the boundary' – apparently Cal Fire just notifying some County entity(?) - with the next one scheduled for 2025. Understanding that SRA boundary adjustments are not part of this "hazard upgrade" action - we will participate in that 2025 forum. (WE REQUEST DIRECT NOTIFICATION OF SAID 2025 HEARING/MEETING SENT TO THE ADDRESS ON OUR LETTERHEAD). It is our current position that Lucerne Valley's upgrades from "Moderate" to "High" and "Very High" are unnecessary and irrelevant to our on-the ground, minimally fire-prone vegetation and density. Potential misuse of the focus on models – probably fed by 'artificial intelligence' - especially a new model and who knows if was tested or not. And projecting worst case/extreme/arbitrary conditions/climate change supposition/extraneous stuff like water shed (which we have but not vegetated any more that the surrounding area)/wind/flying embers/current residential development types/and other factors that don't or marginally exist in that environment (other than wind of course). What is real in our observation is the non-contiguous, sparse creosote vegetation – occasional, seldom, seasonal low lying grass patches - no real typical 'wildland' fuels. We do not have trees and other vegetation normal for a major watershed area. Even our "washes" don't support trees nor riparian-type vegetation. The methodology for determining what the FHZ's intensity ratings are might be just as arbitrary as the methodology for determining

which area will be considered necessary for FHZ's. Since there is no or minimal, contiguous, hazardous fuel source – why are the newly proposed ‘High’ and ‘Very High’ level SRA's warranted? It appears to us that the model used to determine the hazard intensity (moderate, high, very high) is just as arbitrary as the methodology used to establish the area targeted for these SRA's. We have not been convinced of the validity of SRA's in our community nor how Hwy's. 18 and 247 were selected as boundaries - with vegetation the same on both sides. We thought we were in the Mojave Desert with sparse vegetation. We guess the ‘computer models’ have been fed more info. re: a multitude of ‘factors’ other than real ‘wildland’ vegetation – which should be the determining factor for hazard levels. We know that said upgrades will trigger unnecessary building code changes that will make it more expensive to build new homes and even residential additions in that area. The imposition of additional building requirements will affect/limit new home construction in Lucerne Valley. We are hearing contradicting assertions about fire insurance rates and drops: This from CalFire re: insurance: “For many years, insurance companies have been using alternate wildfire risk tools for determining where they will write and renew policies, and how much premium to charge a policyholder, not the Fire Hazard Severity Zone maps. Therefore, a change in designation on the maps for a single homeowner is unlikely to affect their insurance. The reality is that more accurate risk information enables homeowners and communities to reduce their wildfire risks, and Commissioner Lara’s new wildfire mitigation regulation clarifies what actions you should take to reduce wildfire risks. Once that regulation is fully implemented, if a homeowner or business owner takes those risk mitigation actions, they will be able to see a discount in their insurance premium”. From a local realtor and insurance agent: “ I read the attachment from Cal Fire and it sounds real "nice" but the real life/practical issue is that when you buy a home and are given a Natural Hazard Report (required by the state) that shows you are in a Fire area or High Fire area that is the same map the insurance companies are using. They do not use different "risk analysis tools." I have not seen anything different than this when buyers are insuring properties. When buyers have difficulty insuring because of a location and have to use the "California Fair Plan" they pay approximately 3x the insurance rate of a similar property that is not labeled "High Fire". Big Bear is a high fire area and I've seen this with clients buying in that area”. The impact that these “High fire/Very High fire” severity zones will have on fire insurance rates and the ability to even obtain fire insurance appears to be minimized by Cal Fire. Our recent research indicates differing/conflicting opinions from various sources. However, we are already hearing from some residents that they have recently been contacted by their insurance companies re: rising rates or dropped policies “due to Increased hazard”– with some specifying ‘SRA hazard upgrades’. But we can’t confirm that all such notices are directly related to the change in the SRA – nor do we know for certain exactly what model or risk factor is being used by the companies. This could be evidence that insurers are reacting to the new intensities. And it could provide insurance companies wanting out of California a good excuse to drop coverage. Reliable sources confirm that our School District’s Risk Mgt. Insurance rate for its parcel in the SRA will increase due to change from ‘Moderate’ to ‘High’ - taking money out of our classrooms. We are still trying to determine when that parcel changed from a LRA to SRA. Again, conflicting maps. But we also understand that the SRA has been “Moderate” since 2007 - and insurance rates have increased and policy drops have periodically occurred there in the SRA and in the LRA since then – therefore it’s not entirely clear that “High or Very High” intensities in and by themselves will cause all insurance companies to raise rates. We have been informed that Cal Fire bases its intensities on “Hazards” – whereas insurance companies base theirs on “Risk”. We do not know

how many insurance companies rely on Cal Fire's "intensities" for their rates or dropped policies – but some may and we think have. Thus - more confusion. We are a State-designated disadvantaged, low income community trying to recover from the 2008 housing crash. The implementation of these SRA's will treat the people in our communities with disparity. The Lucerne Valley Unified School District is coming back from record low enrollment just a few years ago as well as from the 2008 housing crash. Calfire's wildfire history maps for our area go back to 1878 with very few major wildfires within said SRA's.

<https://projects.capradio.org/california-fire-history/#11.25/34.3729/-117.0513> This should be of no surprise as we have asserted that contiguous high fire hazard vegetation does not exist in the lower elevations. Calfire claims it uses the fire history in part to establish SRA's. Is this an instance of ignoring that data – or do all the other multitudes of 'factors' prevail in that decision? "Public Comment Period 121622 through 020323, Page 13 of 14 CONSIDERATION OF ALTERNATIVES In accordance with Government Code section 11346.5(a)913), OSFM must determine that no reasonable alternative it considers or that has otherwise been identified and brought to the attention of OSFM would be more effective in carrying out the purpose for which the action is proposed, would be as effective and less burdensome to affected private persons than the proposed action, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy of other provision of law". This clearly states that there can be an "alternative" that fits our situation - ie. keep the SRA "Moderate".

DECLARATION OF EVIDENCE The OSFM has determined that this proposed action will not have a significant adverse economic impact. The OSFM has not relied on any other facts, evidence, documents, or testimony to make its initial determination of no statewide adverse economic impact'. To the contrary: There could be a significant, adverse economic impact when factor in the possibility of increased insurance rates – dropped policies – the definite increased costs associated with building code requirements for High and Very High – vs. Moderate. We can only wonder how Cal Fire got through the CEQA process and requirements. This has been a learning/disturbing experience. We get new info. almost every day. (We do appreciate the responses provided by representatives of Cal fire – the County's Fire Safe Alliance – County Fire – etc.). Of all the maps of the SRA changes we have seen – only one indicates a "draft" – in tiny print at the bottom. All the others aren't so labelled. It certainly looks like the 'decision' was made long before even the so-called 'hearings'. We now understand that if the Lucerne Valley SRA is ever rescinded – it could become a LRA with the State still determining its hazard intensities. We just found out that when Cal Fire is done with our SRA south of the highways – it will then 'upgrade' fire hazard intensities in our local LRA – the County jurisdiction - north of the highways. Can the County reject any such designations? All this compounds our confusion over this process, with all the surprises – revelations – mistakes – misunderstandings – etc. we have encountered – and yet to be discovered. That's why we want to be part of these decisions for our community. Our legislators have to make this system more public – less of an unaccountable - bureaucracy-driven process that determines a creosote bush constitutes 'wildland' vegetation. Our Assemblyman Lackey responded well – SEE ATTACHED. Reps. of both parties need to 'walk the halls' in Sacramento and get this fixed. This has been like a drawn out murder mystery novel: Who done it and why? SUMMARY: Upgrades from "Moderate" to "High" and "Very High" are not appropriate, valid or necessary for our particular environment – will definitely result in building code changes and higher construction costs – may very likely result in increased insurance rates or dropped policies - and the consequences of any cost of living increase will be a major economic impact for our State-

designated “Severely Disadvantaged Community” and our “Environmental Justice” ranking. A large portion of our population live within the State SRA, but this is also a community-wide issue as it will affect all residents to various degrees. LEAVE “MODERATE” IN PLACE as in the 2007 maps. We request a local public hearing on this – w/o the dog and pony show done in other areas - and an extended comment period.

Response: CAL FIRE adjusted FHSZ in this area to better match the climate and burn probability of the local area. The fire hazard severity model for wildland fire has two key elements: probability of an area burning and expected fire behavior under extreme fuel and weather conditions. The zones reflect areas that have similar burn probabilities and fire behavior characteristics. The factors considered in determining fire hazard within wildland areas are fire history, flame length, terrain, local weather, and potential fuel over a 50-year period. Outside of wildlands, the model considers factors that might lead to buildings being threatened, including terrain, weather, urban vegetation cover, blowing embers, proximity to wildland, fire history, and fire hazard in nearby wildlands. FHSZs are not a structure loss model, as key information regarding structure ignition (such as roof type, etc.) is not included. The State Fire Marshal notified each County Board of Supervisors and held a public hearing in each county with a Fire Hazard Severity Zone designation in the State Responsibility Area as required by Public Resources Code 4203. For all public comment periods and extensions, all requirements of the Administrative Procedure Act (APA) were followed.

ID 567, Comment: Do I need to fill out a card first? OK, I will do it after. Greetings and thank you very much for the presentation and the opportunity to speak. My name is Ryan Campbell. I am a citizen of Twomey County and a member of the Board of Supervisors. I guess the the comment that I would have is I am, as we look at how. These changes to the severity, high severity, high fire severity zones and how they would affect our community in terms of the acreage size and would I be looking for is more clarity about how this will actually. What the citizens of our Community are going to actually do with this information when it comes to. Deciding whether to develop undeveloped parcels, how it's going to affect their insurance or availability. Ability to get insurance and keep and maintain it. I think that. That's something I would be looking for. And. How? Would communities like ours that are in general in general poor where people are struggling and looking for ways to expand the available housing in our communities? I'm also looking to see how some of the fire severity area changes are going to affect our ability to create and expand available housing in communities like ours that desperately need it. So those are kind of the areas that that I'm interested in. Learning more about and have some concerns of, so thank you very much for the opportunity to speak and I will fill out a comment card. Thank you. Thank you.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The minimum required mitigation requirements for building and development in the State Responsibility area are the same across all Fire Hazard Severity Zones (FHSZ). Therefore, FHSZ changes do not effect building in the State Responsibility Area.

ID 1004, Comment: January 25, 2023 Office of the State Fire Marshal C/O: FHSZ Comments California Department of Forestry and Fire Protection RE: Fire Hazard Severity Zone (FHSZ) Draft Regulation and Map - NOPA – ISOR Dear OSFM, Santa Barbara County Fire Department (SBCFD) has reviewed the proposed new regulations and FHSZ map. Our comments are specific to the portions of the map within Santa Barbara County. As a whole the new map is consistent

with the goals and objectives outlined in the Santa Barbara County Unit Fire Plan as well as the State Strategic Fire Plan. SBCFD agrees with the OSFM that the new maps will benefit public safety by providing directly affected persons with improved resources to identify the most effective measures for fire prevention, including building standards, defensible space requirements, and State Minimum Fire Safe Regulations. We firmly support adopting the new maps as soon as prudently possible. Furthermore, SBCFD is in support of the proposed effort to revise the FHSZ's in the LRA to include High and Moderate FHSZ designations. Providing consistent, objective, science-based hazard mapping is critical to ensuring that future development is designed and regulated to minimize wildfire risk to the greatest extent possible. SBCFD looks forward to adoption of the new maps and appreciate the opportunity to provide input to this proposal. Please feel free to contact me with any questions, 805-681-5500. Rob Hazard. Division Chief/Fire Marshal Santa Barbara County Fire

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The Office of the State Fire Marshal appreciates the response.

ID 910, Comment: To: Chief CAL FIRE Fire Marshall, Chief Daniel Berlant email: FHSZcomments@fire.ca.gov written: Office of the State Fire Marshal California Department of Forestry and Fire Protection P.O. Box 9442460 Sacramento, CA 94244-2460 RE: Education, training, and community-scale Prescribed Grazing programs for wildfire prevention, preparedness, and mitigation Greetings, Chief Berlant: My name is Theodosia Ferguson of Healing Living Systems, Inc. and I am answering the call for public comment regarding fire prevention measures in California. I strongly encourage CAL FIRE to fund prescribed grazing efforts at a community scale that will include workforce development and public education as essential aspects of impactful fire prevention, preparedness, and mitigation programs using small ruminant grazing to manage vegetation. Prescribed grazing projects not only need to have funding support to be implemented, but it is critical to address the challenge of a limited skilled and trained workforce of domestic herders. My recommendation is to fund education and training programs that are in correlation with “community-supported grazing programs”, that have been initiated across that state. Recognizing a future where prescribed grazing practitioners have adequate training such as certified wildland firefighters or prescribed burn practitioners is essential to create and maintain a high standard for using this approach in our communities. An academy or trade school program for graziers will be necessary to grow a competent workforce as this field grows. Best to you and your Statewide Team for your service to the people of California, Theo Ferguson Healing Living Systems, Inc., CEO and Founder Slow Money NoCal SOIL Member Farm Ecosystem Services Consultants Systems to Heal the Climate www.healinglivingsystems.org cell: 510-684-9071

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The Office of the State Fire Marshal appreciates the responses and public review received in this area of the map.

ID 1661, Comment: Hello! Am I in wildfire zone? What is my FireLine Score in Burbank, CA 91501? Thank you, Lori

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The Office of the State Fire Marshal has provided an interactive map throughout the process called SRA FHSZ Rollout Application on our website at <https://calfire->

forestry.maps.arcgis.com/apps/webappviewer/index.html?id=8a08fca5c54f4e6987800f160e2cf9b2

ID 3799, Comment: Hello Can you help me to know if my home is in a high severe fire hazard area?24551 Tabuenca Mission Viejo Ca 92692Regards John J. Rochefort Sent from my iPhone

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The Office of the State Fire Marshal has provided an interactive map throughout the process called SRA FHSZ Rollout Application on our website at <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=8a08fca5c54f4e6987800f160e2cf9b2>.

ID 1424, Comment: Calfire. With respect to the FHSZ interactive map I'm forwarding these two comments. It would be useful if the final FHSZ interactive map could show city/county and jurisdictional boundaries as a toggle display setting. It would be useful if the final FHSZ interactive map could toggle display of any Mutual Threat Zones with local jurisdictions when such zones exist and the displayed map includes those zones. I'm an interested retired citizen and not associated with any government, fire district or fire-fighting organization. Thanks. A.

Andrew Spector619-900-7108 Desk619-889-7510 CellAndrew.Spector@Cox.net

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The Office of the State Fire Marshal has provided an interactive map throughout the process called SRA FHSZ Rollout Application on our website at <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=8a08fca5c54f4e6987800f160e2cf9b2>. This map allows the public to compare the most recent FHSZ map to the 2007 approved map.

ID 2958, Comment: Mapping To: CALFIRE FHSZ Comments FHSZcomments@fire.ca.gov
Thank you for updating our Upper Jerusalem Valley and correcting all the road names. Please be advised that addresses were also changed since none of the 88 parcels affected in this address and road name change in October 2020 lived or were on Jerusalem Grade Road even though all parcels had that road name attached to their number. I still have to type in search my old address of 21192 Jerusalem Grade Rd, Lower Lake, CA and then it does not place me on my parcel but on Jerusalem Grade Road. My new address is 15691 Snake Ranch Road, Middletown for parcel address and 15691 Snake Ranch Road, Lower Lake for mailing address which appears to be the better choice as all maps seem to use the Lower Lake due to the USPS addressing system. The Lake County portal using their GIS mapping system correctly puts me on the map along with the other 88 parcels. Cara Salmon, Public Works and Chief Mike Wink, CalFire, worked on this project. Thank you for making the changes even though I don't like seeing all red.-- Glo Anderson—Glo

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The roads as shown are the product of our software's basemap – OSFM do not have control over them. Fire history is incorporated into the model though it is done through the actual location of the fire perimeter. The mislabeled road in this case does not affect the model output.

ID 534, Comment: FHSZSRA DRAFT 23 1 has an incorrect street address which could impact CalFire fighting fires in our area. We would not want to be missed because of a reference

oversight. I understand that the ArcGIS map cannot be corrected by CalFire BUT please make sure that we are in CalFire's system for firefighters since ArcGIS is incongruent with what the address is locally. The correct address is 72049 E. Bank Rd, Blairsden, CA 96103 and we are miles away from Clio, CA 96106. All county records and deeds state the address as I have listed here but google maps spell it 'Eastbank'. When you are coordinating fighting a fire, you need accurate information that cross references correctly or else we are screwed due to our lack of connectivity by cell and landlines due to our remote location. Someone will think the map is wrong especially since our roads do not show up on google or Apple maps maps. We had a CalFire inspection done just 18 months ago and got a thumbs up but we are in the middle of 40 acres with Natl Forest on 3 sides. Unfortunately, our metal roofs on our two structures, each over 2300 SF, are green so they are not visible in satellite views and aerially because they blend in too well. REFERENCE these 2 links supplied by your severity map:<https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=4466cf1d2b9947bea1d4269997e86553#:~:text=72049%20Eastbank%20Rd%2C%20Clio%2C%20CA%2C%2096106%2C%20US&and%20longitude%20and%20latitude&https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=4466cf1d2b9947bea1d4269997e86553#:~:text=%2D120.581,39.7943>Thanks for the presentation in Plumas County and the video. Thanks for the work. We do what we can but still have our fingers crossed now from May to November. Mary Maggie

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The roads labels as shown are the product of our software's basemap – OSFM do not have control over them.

ID 552, Comment: Regarding the area Valley Center and surrounding area: The recent information on the newly developed Fire Hazard Zone maps has come to my attention and I would like to express some concerns. Public involvement and actual ground observations have been inadequate to accurately evaluate actual risk. Since the 2003 and 2007 fires, enormous mitigation efforts have been completed following the advice of Cal Fire and other fire safety entities in Valley Center. These efforts have greatly reduced the risk of wildfire destruction overall – albeit, in some areas much more so than others. These risk reductions, and variations, are NOT reflected on the hazard maps. Rather, compared to the previous maps, the new hazard maps imply that the extensive risk mitigation efforts taken have INCREASED hazard levels – the opposite of what fire safety agencies have advised the public for the last 20 years. At the very least there should be accompanying maps illustrating those areas where risk mitigation efforts have been significant. Certainly, recognizing wildfire hazard is critically important to funding and planning. However, recognizing risk mitigation efforts is also critically important to informing how these very influential hazard maps should be interpreted, especially by insurance companies as they set homeowner insurance rates. Public involvement and ground surveying are necessary to refine and better reflect the real RISKS in different sections of Valley Center. Please take these concerns into consideration as you move forward with these new maps. Public involvement and ground truthing have been inadequate for evaluating real risk. Hazards are one thing; mitigation efforts reduce real risks. These include very extensive (and expensive) fire hardening projects by SDGE, fire districts and individual homeowners across San Diego County. Enormous mitigation efforts advised by Cal Fire and other fire safety entities in Valley Center since the 2003/2007 fires have greatly reduced the risk of wildfire destruction – in some areas much more so than others. These risk reductions, and variations, are NOT reflected on the hazard

maps. Rather, compared to the previous maps the new hazard maps “show” that extensive risk mitigation efforts have INCREASED hazard levels– the opposite of what fire safety agencies have advised the public for the last 20 years. At the very least there should be accompanying maps showing areas where risk mitigation efforts have been significant. While recognizing wildfire hazard is critically important to funding and planning; recognizing risk mitigation is also critically important to informing how these very influential hazard maps should be interpreted, for example, by insurance companies as they set homeowner insurance rates. Public involvement and ground truthing are necessary to refine and better reflect the real RISKS in different sections of Valley Center. A concern is whether insurance companies will continue to write fire policies in Valley Center or, if they do, how high the premiums will be. Most local fire agencies were not included in the development of the proposed updated map. Also, most of the analysis that was done, was done using multi spectral satellite images, and not by in person inspection. Please consider these comments as many lives will be negatively affected by significantly higher insurance cost. Or worse, no insurance available. Both outcomes will hurt or destroy our community. Thank you. Mike Solorio Former USAF Captain 619-843-7200 Sent from my iPhone

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The State Fire Marshal notified each County Board of Supervisors and held a public hearing in each county with a Fire Hazard Severity Zone designation in the State Responsibility Area as required by Public Resources Code 4203. For all public comment periods and extensions, all requirements of the Administrative Procedure Act (APA) were followed. Mitigations are important for reducing wildfire risk in hazardous areas. FHSZ is intended for long term planning purposes; it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. As FHSZ measured potential hazard, it serves as the basis for needing mitigations.

ID 430 Comment: Chief Daniel Berlant Acting State Fire Marshal Office of State Fire Marshal CAL FIRE 715 P Street Sacramento, CA 95814 SUBJECT: CAL FIRE’s Fire Hazard Severity Zone Map Dear Chief Berlant: I am writing to express my concern over the rollout of the Department of Forestry and Fire Prevention’s (CAL FIRE) 2022 Draft Fire Hazard Severity Zone (FHSZ) maps for the State Responsibility Area (SRA). Specifically, I am concerned about the lack of sufficient time that CAL FIRE has given the public to provide comment on the draft SRA maps, and the significant impacts that the proposed SRA maps will have when adopted. Wildfire hazard mapping is a helpful tool. With these updated SRA maps, CAL FIRE proposes a 14.6 percent increase to the Very High Hazard classification statewide. Within the 21st Senate District, Los Angeles County will see a 14.2 percent increase and San Bernadino County gets a 6.9 percent increase. These changes are considerable and will have real consequences. I am sure CAL FIRE agrees that the public has a right to understand the changes proposed and to participate in the process. It is disappointing to learn that CAL FIRE initiated a minimum public comment timeline of 45-days launched over the holidays and proceeded with hearings during January’s devastating winter storms through a state of emergency declared by Governor Newsom. The public comment period is inadequate considering the Department is advancing significant hazard mapping changes over one-third of California’s land mass. Aside from the process, I am concerned that CAL FIRE’s modeling is not transparent. It fails to consider the substantial fuel load disparities found in distinct geographic areas of the SRA for the Very High Hazard classifications. In regards to fuel loads, the rural, heavily wooded landscapes found in Northern California should not be considered equivalent to the low grasslands and high desert

conditions of my district and across Southern California. When it comes to the fuel load intensity of fire in Very High Hazard designation, one size does not fit all. At a time when the Governor and the legislature have correctly shined a light on California's housing crisis, I fear these maps will be used to attack well-planned, fire safe housing. For example, master planned communities are well-considered and built to modern, Chapter 7A building code standards. Recent legislative sessions have seen efforts to prohibit development of any kind, including these safe master planned communities, within the SRA. As CAL FIRE considers how to reconcile its advancement of hazard maps with its support for communities safely built under Chapter 7A and with defensible space, the Department should clarify the proper usage of hazard maps so that they are not misused. Additionally, like the administrative ability FEMA uses to change federal flood maps, CAL FIRE should also recognize improvements to hazard classifications and accurately reflect a beneficial change when a hazard condition is transformed through development. Should CAL FIRE need statutory clarification to achieve this sort of accuracy in its mapping efforts, please let my office know. The public deserves a reasonable extension to the public comment period before CAL FIRE moves to adopt these maps. The updates to the FHSZ maps are important, but all Californians deserve a legitimate and more thoughtful response than what CAL FIRE has originally considered. I encourage CAL FIRE to extend the comment period beyond February 3, 2023, and to seriously consider the public's input in this consequential mapping effort. Thank you for your consideration. Sincerely, Scott Wilk Senator, 21st District
cc: Chief Joe Tyler Secretary Wade Crowfoot Governor Gavin Newsom

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The Office of the State Fire Marshal has been working closely with the building industry when setting various building codes and defensible space requirements related to Fire Hazard Severity Zones. The Office of the State Fire Marshal has received comments from the building industry and has provided responses to them in the Final Statement of Reasons. FHSZ is intended for long term planning purposes it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. The WUI building codes (California Building Code (CBC) Chapter 7A) reduce the risk of embers fanned by wind-blown wildfires from igniting buildings. The codes for roofing, siding, decking, windows, and vents apply throughout all state responsibility area regardless of the fire hazard severity ranking.

ID 572, Comment: Napa County Verbal Comment #3 This might be a little more informal, but it's not a question. My husband, Jay, and I also live in Circle Circle oaks. We've only been there a year. We did live in South Orange County for 17 years and we were a neighborhood that was next to a wilderness park. So we are not strangers to Cal Fire and so we're not newbies to this. We did evacuate twice in 17 years. And when we were moving here, looking at homes. Down where we lived was moderate. And then we saw that there was a major risk environmental risk in Circle Oaks. So of course you ask realtor, they gave us very informed information. What's her colleagues was doing? We moved there, get to know some neighbors that have lived there 30 plus years telling us all the good stuff storm cloaks have been doing and what Cal fires learned from what's happened the past 10 years. So of course all right, that's what a new homeowner and circle oaks wants to hear. So then when I read their information on next door. And then I started looking at what? Properties are saying on environmental risk up in circle oaks it says that my horse go to extreme hazard which is going to but then it says 60. I think it was 67.1% chance of wildfire. So then I go and I look at real estate in my little area that I used to live in for 17 years.

It's still deemed moderate risk with trees, animal life all around it. It is deemed moderate, but it has a 9090% I think or 90% chance. Of wildfire. So I'm not asking a question. I am making the statement that that is. Two bits of information, and if it is county to county. Decision making. That doesn't make sense to me, and that's some. You know, major investment in your life and all year that we've lived there, all we see is what everybody told us. Work, work, work, work, work. Which again has made us happy. And we believe what we've been told. So this was a. You know. That's all.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The Fire Hazard Severity Zone map evaluates “hazard,” not “risk”. The map is like flood zone maps, where lands are described in terms of the probability level of a particular area being inundated by floodwaters, and not specifically prescriptive of impacts. “Hazard” is based on the physical conditions that create a likelihood and expected fire behavior over a 30 to 50-year period without considering mitigation measures such as home hardening, recent wildfire, or fuel reduction efforts. “Risk” is the potential damage a fire can do to the area under existing conditions, accounting for any modifications such as fuel reduction projects, defensible space, and ignition resistant building construction. The fire hazard severity model for wildland fire has two key elements: probability of an area burning and expected fire behavior under extreme fuel and weather conditions. The zones reflect areas that have similar burn probabilities and fire behavior characteristics. The factors considered in determining fire hazard within wildland areas are fire history, flame length, terrain, local weather, and potential fuel over a 50-year period. Outside of wildlands, the model considers factors that might lead to buildings being threatened, including terrain, weather, urban vegetation cover, blowing embers, proximity to wildland, fire history, and fire hazard in nearby wildlands. FHSZs are not a structure loss model, as key information regarding structure ignition (such as roof type, etc.) is not included.

ID 594, Comment: Hi my name is Rose Laval and I'm I'm of the vice president of the Pleasants Valley Fire Safe Council and I'm a resident of Pleasants Valley Rd. And I want to just build a little bit on Roberta's comments about the severity maps and residents and how they will be affected by the severity maps as a farmer, so many of the residents within the severity map area that we're looking at. As part of the Lu, our farmers. And So what will my comment is what will be the effect? What will cow fires? Needs be for farmers and ranchers who are in this area. Will they be? Will we have a G passes available to us since we're now in this high severity area, what will there be any changes for farmers and ranchers since we're now in a high impact area, high fire area, is that going to change in any way how ranchers and farmers will be allowed to access their property? It is there is a huge number of farmers and ranchers in that area and so we want to know how we're going to be able to access and continue to do the work we need to do and continue our livelihoods in areas that will be impacted by future fires. If you know how are we going to be able to access our properties again, which we're so problematic during the last fire. So since we're being shown that we are in a high severe fire area. Will we be able to have some sort of access to an agg pass as they do in other counties? Is that going to be something that's going to be allowed to us? So that would be my comment and hope since we're in this severe high fire access area. Thank you.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk (such as the California Wildfire Mitigation Program). The Fire Hazard Severity Zone map evaluates “hazard,” not “risk”. The map is like flood zone maps, where lands are described

in terms of the probability level of a particular area being inundated by floodwaters, and not specifically prescriptive of impacts. “Hazard” is based on the physical conditions that create a likelihood and expected fire behavior over a 30 to 50-year period without considering mitigation measures such as home hardening, recent wildfire, or fuel reduction efforts. “Risk” is the potential damage a fire can do to the area under existing conditions, accounting for any modifications such as fuel reduction projects, defensible space, and ignition resistant building construction.

ID 593, Comment: Solano County Verbal Comment #2 Hi, my name is Roberta Bressler Sullivan and I live in English Hills also and went through the LNU Lightning complex fire and this is very informative. I appreciate it, but my question is so because of this new zoning I'm seeing a lot of statistics and information. But I'm wondering, will Cal Fire then be positioned closer to severe severe zone areas? Because at this time we don't have any firefighters. I'm sure Mr Vasquez can speak to that, but we don't have paid fire service in our area because of funding and no money. That's what we've been told. So we'll Kel fire, then be stationed in these severe areas, or moderate to severe areas so that we continue to have quick access because right now all I'm seeing is statistics and information. So I'd like to know what Cal fires and next steps are and what the states responsibility is. So that's my other question. What is meant about the state responsibility maps? Will the state be providing resources to residents in the designated areas in regards to being able to maybe do wood chipping or help for a lot of us senior citizens who live in these areas to have some sort of assistance to meet the state's, you know, what is our responsibility and is the state then going to provide something because I don't know what the state responsibility is, so we'll be. Be talking about that tonight. Because obviously if they have a responsibility to us, the citizens, I'd like to know what that is. Thank you. And I can I still put in another card for more questions because like the other person who commented, we need zoom. I have medical conditions and it puts me at real risk being here tonight and that's why I have a mask on because I have a lung problem and I need some sort of zoom meeting. That's what I how I participate with a fire Safe council is by zoom and it really puts me at risks to have to be here. So if that's at all possible, it would be really helpful for a lot of the citizens in my area to have some sort of Internet access, because a lot of us are older and have medical conditions. Thank you.

Response: This comment is outside of the scope of the modifications to the Fire Hazard Severity Zone rulemaking. The Fire Hazard Severity Zone map evaluates “hazard,” not “risk”. The map is like flood zone maps, where lands are described in terms of the probability level of a particular area being inundated by floodwaters, and not specifically prescriptive of impacts. “Hazard” is based on the physical conditions that create a likelihood and expected fire behavior over a 30 to 50-year period without considering mitigation measures such as home hardening, recent wildfire, or fuel reduction efforts. “Risk” is the potential damage a fire can do to the area under existing conditions, accounting for any modifications such as fuel reduction projects, defensible space, and ignition resistant building construction.

ID 3471: Comment: August 9, 2023 Office of the State Fire Marshal C/O: FHSZ Comments California Department of Forestry and Fire Protection P.O. Box 944246 Sacramento, CA 94244-2460 Via email: fhszcomments@fire.ca.gov RE: Comments on, State Responsibility Area Fire Hazard Severity Zones, dated June 15, 2023 Dear Chief Berlant: Thank you for the opportunity to comment on the draft Fire Hazard Severity Zones (“FHSZ”) maps. The signatories to this letter include tens of thousands of businesses in California employing millions of Californians

whose businesses are affected by the FHSZ maps. California's employers depend on availability and affordability of housing in California to attract new and maintain existing employees. Additionally, members of the building industry are in the business of providing new homes, employment centers, retail establishments, logistic centers and infrastructure to support those uses to maintain California's economic success. We appreciate the modifications that were made to the FHSZ maps after the prior release on November 21, 2022, which, in some cases, more accurately reflect the changes in the conditions on the ground since the 2007 mapping process. Rather than repeat all the comments made in our comment letter of April 4, 2023, we hereby incorporate those comments in full by this reference.

CLARIFYING THE PURPOSE OF THE FHSZ MAPS It remains clear that the public continues to misunderstand the difference between fire "hazard" and fire "risk," with the latest confusion showing up in Court of Appeals decisions (see, e.g., Berkeley Citizens for a Better Plan v. Regents of the Univ. of Cal., 2023 Cal. App. Unpub. LEXIS 2658 [Court repeatedly refers to "high fire risk zones" on state maps]). Widespread confusion over the purpose of the FHSZ maps materializes as impediments and opposition to new housing during the local entitlement process. Accordingly, we share your desire to set the record straight that the FHSZ maps should not be used as a reason to prohibit development in those areas, but rather to apply appropriate regulatory mitigation measures to such development. To avoid future confusion and misuse of the FHSZ maps, we urge CAL FIRE to clarify the record in conjunction with the FHSZ map update. We suggest making the following findings on the record in connection with this update: The FHSZ Maps represent a worst-case scenario based on modeling fire "hazards" under extreme conditions occurring simultaneously. Fire "hazards" are distinguished from fire "risks" because fire "hazards" simply represent the potential wildfire conditions absent mitigating measures such as fuel modification zones, fuel thinning, ignition-resistant building standards, etc. The FHSZ Maps do not consider any hazard-reducing mitigation efforts made by property owners, which can substantially reduce actual "risk" levels. Rather, the FHSZ Maps assume the property will remain in its natural state for decades. Over time, this means that the maps may significantly overstate the actual wildfire hazards for areas that are subsequently developed and/or protected by wildfire mitigation measures and design features. Accordingly, the FHSZ Maps are not intended to, nor should they be used to, deny, delay, or prohibit development projects in any SRA fire hazard severity zone because the FHSZ Maps do not account for the "as built" condition or mitigation features that could reduce impacts related to wildfire to less than significant levels. Rather, the FHSZ Maps are only intended to determine whether specific regulations apply to the development project, such as: The WUI building standards (California Building Code (CBC) Chapter 7A Public Resources Code Section 4291 defensible space clearance Natural hazard disclosure as part of a real estate transfer (Civil Code section 1102.6f) Board of Forestry Fire Safe regulations/Minimum Fire Safe Regulations Defensible Space Real Estate Compliance. (Civil Code Section 1102.19) Residential Code R337 Fire Code Chapter 49 These regulatory requirements represent the most stringent standards to minimize wildfire hazards. Evidence demonstrates that projects complying with these regulations will reduce impacts related to wildfire to acceptable levels, similarly to earthquake mitigation through engineering measures and retrofits.

HAZARD MAP REVISION PROCESS Our members remain very concerned that there is no mechanism to change a property's hazard designation until the next map cycle, which can take many years. As development continues after a cycle update (with the corresponding changes to grading, road improvements, fuel setback zones, etc.), or to correct newly identified errors, the FHSZ maps quickly become outdated and grow increasingly inaccurate over time.

It is extremely important to ensure the accuracy of the FHSZ maps in between the cycle updates because the maps are misunderstood by the public and misused by decision makers. For example, the state and many jurisdictions impose development constraints on new development—including new housing—in mapped Very High fire hazard severity zones, even if a housing project can adequately mitigate wildfire exposure. In other words, other agencies “tier off” CAL FIRE’s maps by linking regulatory requirements to properties located within certain hazard areas. Similarly, in recent years, the Legislature has proposed numerous bills that would prohibit development or impose additional requirements on development within Very High fire hazard severity zones. Again, if an area remains subject to an outdated FHSZ map designation, such legislation could prohibit or impair new housing. Importantly, this means an outdated or inaccurate FHSZ map could make it impossible or much more onerous to build new housing. As such, we respectfully request that CAL FIRE allow discrete revisions to the FHSZ maps to reflect “as built” conditions based on new development. This process could be analogous to the regulatory process that the Federal Emergency Management Agency (“FEMA”) uses to revise floodplain maps following new development. CAL FIRE has the existing regulatory authority to implement such map updates.¹ CAL FIRE could use FEMA’s flood map revision process as a model, allowing for discrete revisions to the FHSZ maps to reflect new development, where the applicant covers CAL FIRE’s administrative review through a reimbursement agreement or application fee. Our proposed approach is summarized as follows, with more details provided in Exhibit A: Step 1: CAL FIRE prepares FHSZ maps as usual. Step 2: A new development project within a very high FHSZ may request that CAL FIRE make a discrete amendment to the FHSZ map through a new application process (along with the payment of an application fee or reimbursement agreement). The application must include applicant-funded fire behavior modeling, a Fire Protection Plan completed by an experienced fire consultant, and data to demonstrate that the new project adequately reduces the potential of ignition and fire spread through the incorporation of mitigation measures including, but not limited to, the following: Fuel modification zones along the community’s perimeter and defensible space within the community’s interior, including on-going funding to maintain these areas; Sufficient evacuation routes that are cleared of vegetative overgrowth; Building construction that satisfies Chapter 7A’s home hardening measures; Ember resistant zones around all structures and decks, consistent with Fire Code Chapter 49; Proximity to firefighting resources; and Local fire agency determination that all applicable aspects of an applicant’s project are consistent with Board of Forestry’s Minimum Fire Safe Regulations or meet the same practical effect on a case-by-case basis. Step 3: After reviewing the application, CAL FIRE may issue a “Tentative Acceptance of Wildfire Hazard Reduction” only if CAL FIRE determines that the new development’s wildfire measures appropriately reduce hazards to public health and safety, thereby supporting a lower fire hazard designation for the site. In addition to CAL FIRE’s inherent authority to ensure the accuracy of the FHSZ Maps, Public Resources Code Section 4204 specifically gives CAL FIRE the ability to periodically review and revise the maps as necessary. (Public Resources Code Section 4204 [“State Fire Marshal shall periodically review zones designated and rated pursuant to this article and, as necessary, shall revise zones or their ratings or repeal the designation of zones.”] (Emphasis added).) Under Section 4203, changes to hazard zone designation processes may be made “by regulation.” (i.e., analogous to FEMA determining that a project’s design modifications change the floodplain hazard). Step 4: Once the project is complete, the developer would submit the “as built” plans to CAL FIRE to confirm that the wildfire hazard reduction measures have been implemented and properly funded for the life of the project. Step 5: If CAL

FIRE concurs that the hazard levels have been reduced, CAL FIRE would issue a “Final Acceptance of Wildfire Hazard Reduction” to formally change the project site’s hazard zone designation. Public notice and an opportunity to appeal would be provided. Once the time to appeal has passed, CAL FIRE would then formally update the FHSZ map available on its website. We are most grateful for your time and courtesy in considering these comments regarding the Draft FHSZ maps. We are happy to meet at any time to discuss the contents of this letter. Accordingly, please contact the undersigned should you have any questions or would like to discuss any of the matters in this letter. Nick Cammarota Senior Vice President & General Counsel California Building Industry Association

Response: No changes were made to the regulation in response to these comments. While the OSFM agrees that risk can be mitigated and often is, the definition of hazard submitted with the comment supports this by the use of the word “unavoidable.” The various areas of required mitigation by the Legislature require mitigations in areas of the State Responsibility Area prone to wildfire. While the OSFM agrees with this work and mitigation of risks it provides, the Fire Hazard Severity Zone model measures hazard and not risk. Long-term Hazard potential – as used in FHSZ -- represents the natural potential of the land to create hazard and provides the basis for fire-safety regulations to reduce risks. The items listed in the comment are requirements relevant to the definition of hazard as used in FHSZ as the comment states but are mitigations that mitigate risk from wildfire. The WUI building codes (California Building Code (CBC) Chapter 7A) reduce the risk of embers fanned by wind-blown wildfires from igniting buildings. The codes for roofing, siding, decking, windows, and vents apply throughout all State Responsibility Area regardless of the fire hazard severity ranking. AB 38: Separate statutory mandates outside of the OSFM’s regulatory scope require that all property in High or Very High FHSZs in the SRA comply with Civil Code 1102.6f, real estate disclosures Assembly Bill 38 (Wood, Chapter 391, Statutes of 2019). These disclosures are known as “AB 38 Defensible Space Inspections,” and are not required for property in Moderate FHSZs in the SRA. As a result of the proposed regulations, the boundaries of Moderate, High, or Very High FHSZs in the SRA may shift, altering which properties are required to comply. However, every FHSZ in the SRA is already required to comply with the underlying defensible space requirements of AB 38 located in PRC Section 4291. The OSFM cannot comment on legislation, or any restrictions placed on construction by the Legislature. However, the OSFM would like to reiterate that the FHSZ designations measure hazard potential and not risk. THE FHSZ designation is built to remain steady for the next 10+ years. Risk models differ from hazard models because they consider the susceptibility of a structure to damage from fire and other short-term factors that are not included in FHSZ modeling. The minimum required mitigation requirements for building and development in the State Responsibility area are the same across all FHSZ’s. Therefore, FHSZ designation changes does not preclude development and the maps are not intended to be a recommendation to prohibit or deter development in these areas. Separate statutory mandates outside of the OSFM’s regulatory scope require that all property in High or Very High FHSZs comply with Civil Code 1102.6f, real estate disclosures Assembly Bill 38 (Wood, Chapter 391, Statutes of 2019). These disclosures are known as “AB 38 Defensible Space Inspections,” and are not required for property in Moderate FHSZs. As a result of the proposed regulations, the boundaries of Moderate, High, or Very High FHSZs may shift, altering which properties are required to comply. However, every FHSZ in the SRA is already required to comply with the underlying defensible space requirements of AB 38 located in PRC Section 4291. The OSFM does not regulate insurance companies nor the risk models they use in determining whether to

write a policy and its cost. The OSFM has not heard that housing projects have stopped mid-build since the ISOR was published. The regulation is currently not final and no change in FHSZ would take effect until April 1, 2024, at the earliest. The FHSZ model measures potential hazard which is based on the physical conditions that create a likelihood and expected fire behavior over a 30 to 50-year period without considering mitigation measures such as home hardening, recent wildfire, or fuel reduction efforts. The Office of the State Fire Marshal posted for public review and comment detailed modeling methods and intermediate data sets during the June 26, 2023, and October 16, 2023, public comment periods. The census data was used in calculating burn probability, but not in defining wildland and non-wildland areas. The 2010 census data was used because that step of the model was completed prior to release of the 2020 census data. Its use in stratification for the burn probability model reflects the general pattern of impacts that come with increased human development. CAL FIRE reviewed comments that noted that specific areas had been developed and no longer constituted a wildland area, and edited the map where warranted. We have also evaluated the veracity of the vegetation derived fuels information in wildland areas called out for review. We released all intermediate data products on (add date when the second public comment period commenced) to help stakeholders evaluate zone designations, including whether an area was zoned as non-wildland, therefore reflecting changes in development patterns.

ID 3778, Comment: October 30, 2023 Office of the State Fire Marshal C/O: FHSZ Comments California Department of Forestry and Fire Protection P.O. Box 944246 Sacramento, CA 94244-2460 VIA email: fhszcomments@fire.ca.gov RE: Comments on, State Responsibility Area Fire Hazard Severity Zones, dated September 29, 2023 Dear Chief Berlant: Thank you for the opportunity to comment on the draft Fire Hazard Severity Zones (“FHSZ”) maps. The signatories to this letter include tens of thousands of businesses in California employing millions of Californians whose businesses are affected by the FHSZ maps. California’s employers depend on availability and affordability of housing in California to attract new and maintain existing employees. Additionally, members of the building industry are in the business of providing new homes, employment centers, retail establishments, logistic centers and infrastructure to support those uses to maintain California’s economic success. We appreciate the modifications that were made to the FHSZ maps after the prior release dated June 15, 2023, which, in some cases, more accurately reflect the changes in the conditions on the ground since the 2007 mapping process. Rather than repeat all the comments made in our previous comments, we hereby incorporate those comments in full by this reference. CLARIFYING THE PURPOSE OF THE FHSZ MAPS It remains clear that the public continues to misunderstand the difference between fire “hazard” and fire “risk,” with the latest confusion showing up in Court of Appeals decisions (see, e.g., Berkeley Citizens for a Better Plan v. Regents of the Univ. of Cal., 2023 Cal. App. Unpub. LEXIS 2658 [Court repeatedly refers to “high fire risk zones” on state maps]). Widespread confusion over the purpose of the FHSZ maps materializes as impediments and opposition to new housing during the local entitlement process. Accordingly, we share your desire to set the record straight that the FHSZ maps should not be used as a reason to prohibit development in those areas, but rather to apply appropriate regulatory mitigation measures to such development. To avoid future confusion and misuse of the FHSZ maps, we urge CAL FIRE to clarify the record in conjunction with the FHSZ map update. We suggest making the following findings on the record in connection with this update: The FHSZ Maps represent a worst-case scenario based on modeling fire “hazards” under extreme conditions occurring simultaneously. Fire “hazards”

are distinguished from fire “risks” because fire “hazards” simply represent the potential wildfire conditions absent mitigating measures such as fuel modification zones, fuel thinning, ignition-resistant building standards, etc. The FHSZ Maps do not consider any hazard-reducing mitigation efforts made by property owners, which can substantially reduce actual “risk” levels. Rather, the FHSZ Maps assume the property will remain in its natural state for decades. Over time, this means that the maps may significantly overstate the actual wildfire hazards for areas that are subsequently developed and/or protected by wildfire mitigation measures and design features. Accordingly, the FHSZ Maps are not intended to, nor should they be used to, deny, delay, or prohibit development projects in any SRA fire hazard severity zone because the FHSZ Maps do not account for the “as built” condition or mitigation features that could reduce impacts related to wildfire to less than significant levels. Rather, the FHSZ Maps are only intended to determine whether specific regulations apply to the development project, such as: The WUI building standards (California Building Code (CBC) Chapter 7A Public Resources Code Section 4291 defensible space clearance Natural hazard disclosure as part of a real estate transfer (Civil Code section 1102.6f) Board of Forestry Fire Safe Regulations/Minimum Fire Safe Regulations Defensible Space Real Estate Compliance. (Civil Code Section 1102.19) Residential Code R337 Fire Code Chapter 49 These regulatory requirements represent the most stringent standards to minimize wildfire hazards. Evidence demonstrates that projects complying with these regulations will reduce impacts related to wildfire to acceptable levels, similarly to earthquake mitigation through engineering measures and retrofits.

HAZARD MAP REVISION PROCESS

Our members remain very concerned that there is no mechanism to change a property’s hazard designation until the next map cycle, which can take many years. As development continues after a cycle update (with the corresponding changes to grading, road improvements, fuel setback zones, etc.), or to correct newly identified errors, the FHSZ maps quickly become outdated and grow increasingly inaccurate over time. It is extremely important to ensure the accuracy of the FHSZ maps in between the cycle updates because the maps are misunderstood by the public and misused by decision makers. For example, the state and many jurisdictions impose development constraints on new development—including new housing—in mapped Very High fire hazard severity zones, even if a housing project can adequately mitigate wildfire exposure. In other words, other agencies “tier off” CAL FIRE’s maps by linking regulatory requirements to properties located within certain hazard areas. Similarly, in recent years, the Legislature has proposed numerous bills that would prohibit development or impose additional requirements on development within Very High fire hazard severity zones. Again, if an area remains subject to an outdated FHSZ map designation, such legislation could prohibit or impair new housing. Importantly, this means an outdated or inaccurate FHSZ map could make it impossible or much more onerous to build new housing. As such, we respectfully request that CAL FIRE allow discrete revisions to the FHSZ maps to reflect “as built” conditions based on new development. This process could be analogous to the regulatory process that the Federal Emergency Management Agency (“FEMA”) uses to revise floodplain maps following new development. CAL FIRE has the existing regulatory authority to implement such map updates. 1 CAL FIRE could use FEMA’s flood map revision process as a model, allowing for discrete revisions to the FHSZ maps to reflect new development, where the applicant covers CAL FIRE’s administrative review through a reimbursement agreement or application fee. Our proposed approach is summarized as follows, with more details provided in Exhibit A: Step 1: CAL FIRE prepares FHSZ maps as usual. Step 2: A new development project within a very high FHSZ may request that CAL FIRE make a discrete amendment to the FHSZ map through a new application process

(along with the payment of an application fee or reimbursement agreement). The application must include applicant-funded fire behavior modeling, a Fire Protection Plan completed by an experienced fire consultant, and data to demonstrate that the new project adequately reduces the potential of ignition and fire spread through the incorporation of mitigation measures including, but not limited to, the following: Fuel modification zones along the community's perimeter and defensible space within the community's interior, including on-going funding to maintain these areas; Sufficient evacuation routes that are cleared of vegetative overgrowth; Building construction that satisfies Chapter 7A's home hardening measures; Ember resistant zones around all structures and decks, consistent with Fire Code Chapter 49; Proximity to firefighting resources; and Local fire agency determination that all applicable aspects of an applicant's project are consistent with Board of Forestry's Minimum Fire Safe Regulations or meet the same practical effect on a case-by-case basis. Step 3: After reviewing the application, CAL FIRE may issue a "Tentative Acceptance of Wildfire Hazard Reduction" only if CAL FIRE determines that the new development's wildfire measures appropriately reduce hazards to public health and safety, thereby supporting a lower fire hazard designation for the site. In addition to CAL FIRE's inherent authority to ensure the accuracy of the FHSZ Maps, Public Resources Code Section 4204 specifically gives CAL FIRE the ability to periodically review and revise the maps as necessary. (Public Resources Code Section 4204 ["State Fire Marshal shall periodically review zones designated and rated pursuant to this article and, as necessary, shall revise zones or their ratings or repeal the designation of zones."] (Emphasis added).) Under Section 4203, changes to hazard zone designation processes may be made "by regulation." (i.e., analogous to FEMA determining that a project's design modifications change the floodplain hazard). • Step 4: Once the project is complete, the developer would submit the "as built" plans to CAL FIRE to confirm that the wildfire hazard reduction measures have been implemented and properly funded for the life of the project. Step 5: If CAL FIRE concurs that the hazard levels have been reduced, CAL FIRE would issue a "Final Acceptance of Wildfire Hazard Reduction" to formally change the project site's hazard zone designation. Public notice and an opportunity to appeal would be provided. Once the time to appeal has passed, CAL FIRE would then formally update the FHSZ map available on its website. We are most grateful for your time and courtesy in considering these comments regarding the Draft FHSZ maps. We are happy to meet at any time to discuss the contents of this letter. Accordingly, please contact the undersigned should you have any questions or would like to discuss any of the matters in this letter. Sincerely, Nick Cammarota Senior Vice President & General Counsel California Building Industry Association ncammarota@cbia.org

Response: No changes were made to the regulation in response to these comments. For those previous comments incorporated, please refer to response 3471. However, the OSFM agrees with the sentiment of the comment and would like to clarify for the record what the FHSZ model takes into account when determining classification and also what the FHSZ classifications should be used for. The Fire Hazard Severity Zone (FHSZ) maps are developed using a science-based and field-tested model that assigns a hazard score based on the factors that influence fire likelihood and fire behavior. Many factors are considered such as fire history, existing and potential fuel (natural vegetation), predicted flame length, blowing embers, terrain, and typical fire weather for the area. There are three levels of hazard in the State Responsibility Areas: moderate, high, and very high. Fire Hazard Severity Zone maps evaluate "hazard," not "risk". They are like flood zone maps, where lands are described in terms of the probability level of a particular area being inundated by floodwaters, and not specifically prescriptive of impacts. For

this model, “Hazard” is based on the physical conditions that create a likelihood and expected fire behavior over a 30 to 50-year period without considering mitigation measures such as home hardening, recent wildfire, or fuel reduction efforts. “Risk” is the potential damage a fire can do to the area under existing conditions, accounting for any modifications such as fuel reduction projects, defensible space, and ignition resistant building construction. The FHSZ map should not be used to deny, delay, or prohibit development in the State Responsibility Area. Rather, the FHSZ map should be used to inform how a development should be constructed and determine what other legal requirements, like wildfire mitigation measures, are associated with that particular classification. Therefore, FHSZ designation changes do not preclude development and the maps are not intended to be a recommendation to prohibit or deter development in these areas. Based on the way the model is run Statewide and affects both the SRA and LRA, an appeals process that attempts to update one development at a time is currently not feasible.

ID 2568 – 2572, Comment: The Office of the State Fire Marshal received a large document associated with Tejon Ranch. The comment is too large to place in document but is associated with ID’s 2568 – 2572.

Response: The Fire Hazard Severity Zone map evaluates “hazard,” not “risk”. The map is like flood zone maps, where lands are described in terms of the probability level of a particular area being inundated by floodwaters, and not specifically prescriptive of impacts. “Hazard” is based on the physical conditions that create a likelihood and expected fire behavior over a 30 to 50-year period without considering mitigation measures such as home hardening, recent wildfire, or fuel reduction efforts. “Risk” is the potential damage a fire can do to the area under existing conditions, accounting for any modifications such as fuel reduction projects, defensible space, and ignition resistant building construction.

Comments Received During Third Round Comment Period:

ID 3778, Comment: August 9, 2023 Office of the State Fire Marshal C/O: FHSZ Comments California Department of Forestry and Fire Protection P.O. Box 944246 Sacramento, CA 94244-2460 Via email: fhszcomments@fire.ca.gov RE: Comments on, State Responsibility Area Fire Hazard Severity Zones, dated June 15, 2023 Dear Chief Berlant: Thank you for the opportunity to comment on the draft Fire Hazard Severity Zones (“FHSZ”) maps. The signatories to this letter include tens of thousands of businesses in California employing millions of Californians whose businesses are affected by the FHSZ maps. California’s employers depend on availability and affordability of housing in California to attract new and maintain existing employees. Additionally, members of the building industry are in the business of providing new homes, employment centers, retail establishments, logistic centers and infrastructure to support those uses to maintain California’s economic success. We appreciate the modifications that were made to the FHSZ maps after the prior release on November 21, 2022, which, in some cases, more accurately reflect the changes in the conditions on the ground since the 2007 mapping process. Rather than repeat all the comments made in our comment letter of April 4, 2023, we hereby incorporate those comments in full by this reference. CLARIFYING THE PURPOSE OF THE FHSZ MAPS It remains clear that the public continues to misunderstand the difference between fire “hazard” and fire “risk,” with the latest confusion showing up in Court of Appeals decisions (see, e.g., Berkeley Citizens for a Better Plan v. Regents of the Univ. of Cal., 2023 Cal. App. Unpub. LEXIS 2658 [Court repeatedly refers to “high fire risk zones” on state maps]).

Widespread confusion over the purpose of the FHSZ maps materializes as impediments and opposition to new housing during the local entitlement process. Accordingly, we share your desire to set the record straight that the FHSZ maps should not be used as a reason to prohibit development in those areas, but rather to apply appropriate regulatory mitigation measures to such development. To avoid future confusion and misuse of the FHSZ maps, we urge CAL FIRE to clarify the record in conjunction with the FHSZ map update. We suggest making the following findings on the record in connection with this update: The FHSZ Maps represent a worst-case scenario based on modeling fire “hazards” under extreme conditions occurring simultaneously. Fire “hazards” are distinguished from fire “risks” because fire “hazards” simply represent the potential wildfire conditions absent mitigating measures such as fuel modification zones, fuel thinning, ignition-resistant building standards, etc. The FHSZ Maps do not consider any hazard-reducing mitigation efforts made by property owners, which can substantially reduce actual “risk” levels. Rather, the FHSZ Maps assume the property will remain in its natural state for decades. Over time, this means that the maps may significantly overstate the actual wildfire hazards for areas that are subsequently developed and/or protected by wildfire mitigation measures and design features. Accordingly, the FHSZ Maps are not intended to, nor should they be used to, deny, delay, or prohibit development projects in any SRA fire hazard severity zone because the FHSZ Maps do not account for the “as built” condition or mitigation features that could reduce impacts related to wildfire to less than significant levels. Rather, the FHSZ Maps are only intended to determine whether specific regulations apply to the development project, such as: The WUI building standards (California Building Code (CBC) Chapter 7A Public Resources Code Section 4291 defensible space clearance Natural hazard disclosure as part of a real estate transfer (Civil Code section 1102.6f) Board of Forestry Fire Safe Regulations/Minimum Fire Safe Regulations Defensible Space Real Estate Compliance. (Civil Code Section 1102.19) Residential Code R337 Fire Code Chapter 49 These regulatory requirements represent the most stringent standards to minimize wildfire hazards. Evidence demonstrates that projects complying with these regulations will reduce impacts related to wildfire to acceptable levels, similarly to earthquake mitigation through engineering measures and retrofits. HAZARD MAP REVISION PROCESS Our members remain very concerned that there is no mechanism to change a property’s hazard designation until the next map cycle, which can take many years. As development continues after a cycle update (with the corresponding changes to grading, road improvements, fuel setback zones, etc.), or to correct newly identified errors, the FHSZ maps quickly become outdated and grow increasingly inaccurate over time. It is extremely important to ensure the accuracy of the FHSZ maps in between the cycle updates because the maps are misunderstood by the public and misused by decision makers. For example, the state and many jurisdictions impose development constraints on new development—including new housing—in mapped Very High fire hazard severity zones, even if a housing project can adequately mitigate wildfire exposure. In other words, other agencies “tier off” CAL FIRE’s maps by linking regulatory requirements to properties located within certain hazard areas. Similarly, in recent years, the Legislature has proposed numerous bills that would prohibit development or impose additional requirements on development within Very High fire hazard severity zones. Again, if an area remains subject to an outdated FHSZ map designation, such legislation could prohibit or impair new housing. Importantly, this means an outdated or inaccurate FHSZ map could make it impossible or much more onerous to build new housing. As such, we respectfully request that CAL FIRE allow discrete revisions to the FHSZ maps to reflect “as built” conditions based on new development. This process could be analogous to the

regulatory process that the Federal Emergency Management Agency (“FEMA”) uses to revise floodplain maps following new development. CAL FIRE has the existing regulatory authority to implement such map updates.¹ CAL FIRE could use FEMA’s flood map revision process as a model, allowing for discrete revisions to the FHSZ maps to reflect new development, where the applicant covers CAL FIRE’s administrative review through a reimbursement agreement or application fee. Our proposed approach is summarized as follows, with more details provided in Exhibit A: Step 1: CAL FIRE prepares FHSZ maps as usual. Step 2: A new development project within a very high FHSZ may request that CAL FIRE make a discrete amendment to the FHSZ map through a new application process (along with the payment of an application fee or reimbursement agreement). The application must include applicant-funded fire behavior modeling, a Fire Protection Plan completed by an experienced fire consultant, and data to demonstrate that the new project adequately reduces the potential of ignition and fire spread through the incorporation of mitigation measures including, but not limited to, the following: Fuel modification zones along the community’s perimeter and defensible space within the community’s interior, including on-going funding to maintain these areas; Sufficient evacuation routes that are cleared of vegetative overgrowth; Building construction that satisfies Chapter 7A’s home hardening measures; Ember resistant zones around all structures and decks, consistent with Fire Code Chapter 49; Proximity to firefighting resources; and Local fire agency determination that all applicable aspects of an applicant’s project are consistent with Board of Forestry’s Minimum Fire Safe Regulations or meet the same practical effect on a case-by-case basis. Step 3: After reviewing the application, CAL FIRE may issue a “Tentative Acceptance of Wildfire Hazard Reduction” only if CAL FIRE determines that the new development’s wildfire measures appropriately reduce hazards to public health and safety, thereby supporting a lower fire hazard designation for the site. In addition to CAL FIRE’s inherent authority to ensure the accuracy of the FHSZ Maps, Public Resources Code Section 4204 specifically gives CAL FIRE the ability to periodically review and revise the maps as necessary. (Public Resources Code Section 4204 [“State Fire Marshal shall periodically review zones designated and rated pursuant to this article and, as necessary, shall revise zones or their ratings or repeal the designation of zones.”] (Emphasis added).) Under Section 4203, changes to hazard zone designation processes may be made “by regulation.” (i.e., analogous to FEMA determining that a project’s design modifications change the floodplain hazard). Step 4: Once the project is complete, the developer would submit the “as built” plans to CAL FIRE to confirm that the wildfire hazard reduction measures have been implemented and properly funded for the life of the project. Step 5: If CAL FIRE concurs that the hazard levels have been reduced, CAL FIRE would issue a “Final Acceptance of Wildfire Hazard Reduction” to formally change the project site’s hazard zone designation. Public notice and an opportunity to appeal would be provided. Once the time to appeal has passed, CAL FIRE would then formally update the FHSZ map available on its website. We are most grateful for your time and courtesy in considering these comments regarding the Draft FHSZ maps. We are happy to meet at any time to discuss the contents of this letter. Accordingly, please contact the undersigned should you have any questions or would like to discuss any of the matters in this letter. Nick Cammarota Senior Vice President & General Counsel California Building Industry Association

Response: OSFM evaluated each comment, no changes were made to the regulation in response to this comment. Additionally, when the comment was made it was outside the scope of the changes made to the map for which public commented was being accepted.

ID 3739, Comment: Dear representative, Do you have a list of house addresses in fire zone areas that you can share ?Thank you ,Best-- Anahit Hovhannisyan Unmatched Solutions for Supply Chain Issues398 Laguna Terrace Simi Valley, California, 93065Email:

anahit@quantumtechnology.us.com Learn More About Us

Response: OSFM evaluated each comment, no changes were made to the regulation in response to this comment. Additionally, when the comment was made it was outside the scope of the changes made to the map for which public commented was being accepted. OSFM evaluated each comment, no changes were made to the regulation in response to this comment.

Additionally, when the comment was made it was outside the scope of the changes made to the map for which public commented was being accepted. No, but the map does allow the public to search by address and zoom into that location to identify which zone a property is in.

ID 3721, Comment: Hello, I am hoping to view the new updated proposed maps that were noted in regards to the Fire Hazard Severity Zone. Thank you, Maggie Maggie Philipsborn Director of Membership and Education Nevada County Cannabis Alliance419 Broad Street, Suite CNevada City, CA 95959 530 -264 - 7376 (office) www.nccannabisalliance.orgCONFIDENTIALITY NOTICE: The contents of this email message and any attachments are intended solely for the addressee(s) and may contain confidential and/or privileged information and may be legally protected from disclosure. If you are not the intended recipient of this message or their agent, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and any attachments. If you are not the intended recipient, you are hereby notified that any use, dissemination, copying, or storage of this message or its attachments is strictly prohibited.

Response: OSFM evaluated each comment, no changes were made to the regulation in response to this comment. Additionally, when the comment was made it was outside the scope of the changes made to the map for which public commented was being accepted. The Office of the State Fire Marshal has provided an interactive map throughout the process called SRA FHSZ Rollout Application on our website at <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=8a08fca5c54f4e6987800f160e2cf9b2>

ID 3710, Comment: Our property is located in the red area of Valley Center (92082). We are a residential neighborhood with fire hydrants close by and within our community and ALL OUR POWER LINES ARE UNDERGROUND. Our insurance rates (if we can find insurance) have doubled and this is insane. There is no brush (dead or otherwise) in our neighborhood. We are within feet of a yellow zone, yet their properties are no different than ours (same developer).Please reconsider rezoning us out of the red area as you are making selling our houses darn near impossible due to the restrictions from the insurance companies. Have CAL FIRE come out and physically look at our area rather than just arbitrarily put us in the RED ZONE. Thank you for your consideration in this matter. Laurie Rector30870 Palomar Vista Dr. Valley Center, CA. 92082

Response: OSFM evaluated each comment, no changes were made to the regulation in response to this comment. Additionally, when the comment was made it was outside the scope of the changes made to the map for which public commented was being accepted. The Fire Hazard Severity Zone map evaluates “hazard,” not “risk”. The map is like flood zone maps, where lands are described in terms of the probability level of a particular area being inundated by

floodwaters, and not specifically prescriptive of impacts. “Hazard” is based on the physical conditions that create a likelihood and expected fire behavior over a 30 to 50-year period without considering mitigation measures such as home hardening, recent wildfire, or fuel reduction efforts. “Risk” is the potential damage a fire can do to the area under existing conditions, accounting for any modifications such as fuel reduction projects, defensible space, and ignition resistant building construction. CAL FIRE’s maps are intended to drive local planning decisions, not insurance decisions. Under Commissioner Lara’s new regulation finalized in October 2022, insurance companies must provide discounts for wildfire safety actions such as community mitigation and home-hardening, which CAL FIRE’s maps do not assess. In addition, insurance companies are already using risk analysis tools and models that go beyond CAL FIRE’s proposed maps in determining what properties they will underwrite. Commissioner Lara’s new wildfire safety regulation will help increase access to insurance by promoting wildfire safety across the state. Reducing wildfire risks throughout the state is the primary way we can make insurance more available and affordable, and our regulation is a major step towards that goal. CAL FIRE’s maps support that goal through improving public education about hazard and the need for safety preparation. Separate statutory mandates outside of the OSFM’s regulatory scope require that all property in High or Very High FHSZs in the SRA comply with Civil Code 1102.6f, real estate disclosures Assembly Bill 38 (Wood, Chapter 391, Statutes of 2019). These disclosures are known as “AB 38 Defensible Space Inspections,” and are not required for property in Moderate FHSZs in the SRA. As a result of the proposed regulations, the boundaries of Moderate, High, or Very High FHSZs in the SRA may shift, altering which properties are required to comply. However, every FHSZ in the SRA is already required to comply with the underlying defensible space requirements of AB 38 located in PRC Section 4291.

Overview: Model Error – The Office of the State Fire Marshal received 2 comments that were outside the specific areas open for public comment during the 10/13/23-10/30/23 comment period, however CAL FIRE still looked at the area. The comment ID’s that relate to those comments are as followed: [3775, 3764].

Response: OSFM evaluated each comment, no changes were made to the regulation in response to this comment. Additionally, when the comment was made it was outside the scope of the changes made to the map for which public commented was being accepted. The community of Rosena Ranch is outside of the specific areas open for public comment during the 10/13/23-10/30/23 comment period. This area underwent two periods of public comment previously. The Verdemont community (outlined in purple) is zoned as non-wildland, with FHSZ scored by a buffer routine where areas closest to the wildland interface have higher hazard and hazard decreases towards the interior of the urbanized area. Buffers persist irrespective of jurisdictional and property boundaries in FHSZ modeling due to consistent mapping requirements across the State. No change needed.

ID 3777, Comment: October 30, 2023 VIA U.S. MAIL AND E-MAIL
(fhszcomments@fire.ca.gov) Office of the State Fire Marshal c/o: FHSZ Comments California Department of Forestry and Fire Protection P.O. Box 944246 Sacramento, CA 94244-2460
Reference: Draft Fire Hazard Severity Zone Maps (Updated September 29, 2023) Subject: Rancho Mission Viejo Comments Greetings, Chief Berlant: As previously expressed (both in person and in prior comment letters), Rancho Mission Viejo, LLC (“RMV”) very much appreciates the tremendous efforts of the California Department of Forestry and Fire Protection

(“CAL FIRE”) in updating the Fire Hazard Severity Zone Maps (“FHSZ Maps”) and allowing all interested stakeholders – including RMV – to provide comments in relation thereto. Consistent with RMV’s prior comments, the desire is to work collaboratively with CAL FIRE to ensure that the Department has full and complete information available for use in completing the map update process. By continuing with this collaborative process, RMV believes that the final FHSZ Maps adopted by CAL FIRE can – and will – accurately reflect conditions within the State Responsibility Areas, thereby allowing the FHSZ Maps to serve as a reliable resource for all interested parties. To that end, we appreciate the opportunity afforded by CAL FIRE to provide comments in relation to the most recent drafts of the FHSZ Maps dated September 29, 2023 (the “Third Draft FHSZ Maps”). The following letter presents RMV’s comments in relation to the Third Draft FHSZ Maps. In reviewing the Third Draft FHSZ Maps, it is clear that CAL FIRE has considered many of the comments previously prepared and presented by RMV in its April 3, 2023, and August 9, 2023 comment letters relative to the Initial Draft Fire Hazard Severity Zone Maps and the Second Draft FHSZ Maps, respectively. RMV genuinely appreciates these revisions. Notwithstanding, there remain a few areas where the Third Draft FHSZ Maps fail to correctly reflect existing conditions on the Rancho Mission Viejo property (the “Ranch”) and, as such, RMV respectfully requests that CAL FIRE revisit these inaccurately ascribed areas. Those portions of the Third Draft FHSZ Maps that reflect inaccurate or incomplete information concerning the Ranch are addressed in Section I, below. Thereafter, Section II of this letter sets forth RMV’s specific requests for improving the Third Draft FHSZ Maps, followed by RMV’s concluding remarks (Section III).

I. Inaccurate / Incomplete Information Reflected in the Third Draft FHSZ Maps

A. Ranch Plan Overview. As a reminder from our April 3, 2023, and August 9, 2023, comment letters (collectively, the “Prior RMV Comment Letters”), the entitlements for the Ranch (collectively known as the “Ranch Plan”) authorize development of six (6) individual “Planning Areas” that are located within the remaining Ranch acreage. The geographic bounds of the Ranch and the individual Ranch Plan Planning Areas are generally depicted in Figure 1 (see below). In our Prior RMV Comment Letters, we pointed out three (3) villages within the Ranch Plan community where (i) homes have been constructed and occupied and (ii) both the Initial Draft FHSZ Maps (ala November 21, 2022 and the Second Draft FHSZ Maps (ala June 15, 2023) fail to accurately / completely account for said development and occupancy; namely: The Village of Sendero (aka “Planning Area 1”), the northerly phase of the Village of Esencia (aka “Planning Area 2”), and the developing phases of the Village of Rienda (aka “Planning Area 3”). Figure 1 (see below) depicts the locations of the individual villages / Planning Areas where construction and occupation have occurred. Notably, the Third Draft FHSZ Maps reflect changes in the fire zone designations for portions of the Ranch that correspond to the development and occupancy data previously shared by RMV in its August comment letter – to wit, the Second Draft FHSZ Maps now account for construction and occupancy within all of Planning Area 1 and much of the developed areas within Planning Area 3 (see Figure 2, below). Notwithstanding the foregoing revisions, the Third Draft FHSZ Maps continue to reflect inaccurate or incomplete data with respect to other portions of the Ranch which, in turn, results in improper fire zone designations for these areas. These areas are individually discussed and depicted in the following subsection.

B. Developed Portions of Ranch that Are Incorrectly Designated

1. Cow Camp Road and Los Patrones Parkway Adjacent to Village of Esencia (Planning Area 2) As identified and discussed in our Prior RMV Comment Letters, Cow Camp Road and Los Patrones Parkway are major arterial highways that are located, respectively, along the southerly and easterly edges of development in the Village of Esencia (Planning Area 2). The roadways/areas in question are

depicted in Figure 3, below. These large, paved areas with significant manufactured slopes and irrigated landscaped areas should be designated as Non-Wildland (Urban). Notably, the Non-Wildland (Urban) designation is utilized for roadways in other areas, but not consistently. The yellow outline on the aerial photograph on the left of Figure 3 indicates an inconsistent and inaccurate depiction of the pavement, manufactured slope and non-combustible vegetation on the south side of Cow Camp Road (south side of Planning Area 2). As depicted on the current Google Earth exhibit that is reproduced on the right side of Figure 3, a wide swath of the green pattern designating “Other Non-Wildland (Agricultural, Water, Barren, Etc.)” should continue further to the east to meet up with the “Non-Wildland (Urban)” designated area that covers Cow Camp Road and the San Diego Gas & Electric substation on the side of Cow Camp Road (located at the southwest corner of Planning Area 2). In addition, Los Patrones Parkway along the easterly boundary of Planning Area 2 should also be designated by the green pattern designating “Other Non-Wildland (Agricultural, Water, Barren, Etc.)” in order to account for the pavement, manufactured slope and non-combustible vegetation comprising said right-of-way.

2. Orchards Adjacent to the Village of Rienda (Planning Area 3) As addressed in our Prior RMV Comment Letters, avocado and citrus orchards have proven to be excellent fire buffers in Orange County. There are many documented instances where a wildfire grinds to a halt within an orchard, with only heat damage to the fruit and no fire propagation within the orchard. In some areas of the state, orchards that are not well maintained may no longer be wildfire resistant; however, RMV is committed to the ongoing operation, maintenance and irrigation of its existing orchards. Of particular import, RMV has been actively cultivating its orchards for over 100 years. And, orchards on the Ranch have historically served as a buffer for wildland fire activity. RMV’s orchards are planted and maintained uniformly throughout the Ranch. However, the fire hazard severity zone map designations of agricultural on the Ranch are not entirely consistent with the actual limits of the existing orchards on the Ranch. Notably, the orchards located adjacent to Planning Area 3 (see Figure 4, below) are not fully / accurately identified as “Non-Wildland (Urban):” As addressed in our Prior RMV Comment Letters, avocado and citrus orchards have proven to be excellent fire buffers in Orange County. There are many documented instances where a wildfire grinds to a halt within an orchard, with only heat damage to the fruit and no fire propagation within the orchard. In some areas of the state, orchards that are not well maintained may no longer be wildfire resistant; however, RMV is committed to the ongoing operation, maintenance and irrigation of its existing orchards. Of particular import, RMV has been actively cultivating its orchards for over 100 years. And, orchards on the Ranch have historically served as a buffer for wildland fire activity. RMV’s orchards are planted and maintained uniformly throughout the Ranch. However, the fire hazard severity zone map designations of agricultural on the Ranch are not entirely consistent with the actual limits of the existing orchards on the Ranch. Notably, the orchards located adjacent to Planning Area 3 (see Figure 4, below) are not fully / accurately identified as “Non-Wildland (Urban):” As an analog to the preceding subsection, the Third Draft FHSZ Maps classifies some orchard areas within Planning Area 2 as Non-Wildland, but said classification is neither complete nor uniform (see, e.g., Figure 5, below). The yellow outline on the aerial photograph that appears on the left of Figure 5 indicates an inconsistent and inaccurate designation of orchards along either side of Chiquita Canyon Drive on the west side of Planning Area 2. As depicted on the current Google Earth exhibit which appears on the right of Figure 5, the area in question is a uniformly maintained orchard. Accordingly, the Third Draft FHSZ Maps should be revised to identify the entire area in question as “Non-Wildland” – to wit, the area encircled on Figure 5 should be

designated “Other Non- Wildland (Agricultural, Water, Barren, Etc.)” in order maintain consistency between the large green swath to the southwest and the “Non-Wildland (Urban)” designated area that covers all of the northern portion of Planning Area 2. In short: All existing / maintained orchards within the Ranch should be designated “Non- Wildland.” 4. Northern Phase of the Village of Esencia (Planning Area 2) As identified in each of our Prior RMV Comment Letters, the entire Village of Esencia (Planning Area 2) has been developed and is occupied by residents. However, the Third Draft FHSZ Maps continue to reflect incorrect information regarding the northerly phase of the Village of Esencia (the “Northern Phase”). Figure 6 (below) is a Google Earth aerial photo from August 2021 that focuses on the Northern Phase. As reflected in Figure 7, development of the Northern Phase is complete. Notably, since 2020, approximately 877 homes of all types (including affordable housing units) have been completed and occupied within the identified area. This entire area is constructed of ember and ignition resistant materials and, consequently, changes the nature of the fire hazard. RMV hereby renews its request that the Northern Phase be classified as “Non-Wildland” for purposes of determining the proper fire hazard severity zone designation for the subject land. Specifically, RMV respectfully requests that CAL FIRE remodel the Northern Phase as a Non- Wildland area, using criteria that recognize the urban / suburban nature of the developed area. As discussed in each of our Prior RMV Comment Letters, RMV has previously modeled the Northern Phase based upon the area’s developed state and has determined that, with implementation of approved fire resiliency strategies, characterization of the Northern Phase as a very high fire hazard area is not appropriate. Were CAL FIRE to model the Northern Phase as Non-Wildland (ala urban / suburban community), RMV anticipates that CAL FIRE would arrive at the same conclusion as RMV - i.e., CAL FIRE’s final fire hazard severity zone maps should be modified / corrected to remove the Northern Phase from the Very High Fire Hazard Severity Zone (with placement of said area into a zone that more accurately reflects the urbanized and developed nature of the property). We hereby respectfully request a Zoom meeting with CAL FIRE to specifically discuss this repeated request, as we are not clear on why this developed portion of the Village of Esencia is not classified as “Non-Wildland” similar to the rest of the developed Village of Esencia.

II. Requests of RMV A. Redesignation of Urbanized Areas as Non-Wildlands; Remodeling of Areas. As per our Prior RMV Comment Letters, RMV continues to respectfully request that CAL FIRE (i) redesignate all urbanized and urbanizing villages within the Ranch Plan area as “Non- Wildland” areas rather than “Wildland” areas and (ii) remodel each of said Non-Wildland areas using criteria that recognize the developed / built-out nature of each area. As specifically noted in Section I.B.4, above, the Northern Phase of the Village of Esencia is completely built-out / urbanized. However, said area continues to be mistakenly characterized as “Wildland” which, in turn, leads to a modeling result that is inconsistent with / inapposite to existing conditions. Were CAL FIRE to: properly characterize all developed areas within the Ranch as “Non-Wildland” (said areas comprised of the Northern Phase, along with Planning Area 1, the balance of Planning Area 2 and the developed portion of Planning Area 3) and remodel these areas using Non-Wildland criteria RMV anticipates that the fire hazard severity zone designations for each area would change (see next subparagraph). B. Revisions to Draft FHSZ Maps. Assuming CAL FIRE’s acceptance / adoption of the revisions addressed in Section I.B, above, and in anticipation of CAL FIRE’s remodeling of the developed portions of the Ranch as Non-Wildland areas, certain changes to CAL FIRE’s fire hazard severity zone maps would be in order. Notably (and specifically), the urbanized and developed portions of the Ranch (i.e., the Village of Sendero, the Northern Phase of Esencia and the Southern Portion of Rienda)

should be regarded / addressed in a manner that is consistent with CAL FIRE's earlier treatment and classification of both Ladera Ranch and the southern portion of the Village of Esencia (again, fully-developed areas). As a result of our requested revisions, it is possible that some portion of the developed portions of the Ranch could be re-classified from high to moderate Fire Hazard Severity Zones. C. Protocol for Future Map Revisions. As RMV continues to develop and implement the Ranch Plan over the next 20+ years, it is extremely important to ensure the FHSZ maps which pertain to the Ranch remain accurate at all times – not just at the five (5) and ten (10) year update intervals. Last month, we initiated grading on another 390 acres for Phase 3 & 4 of the Rienda Village that is not accounted for in the current CAL FIRE map update process. As such, we respectfully request that CAL FIRE allow discrete, intermittent revisions to the FHSZ maps to reflect “as built” conditions based on new development. The California Building Industry Association (“CBIA”) has previously developed a draft protocol for CAL FIRE's consideration in relation to the accomplishment of discrete map revisions (see instrument entitled “Proposed Hazard Map Revision Process,” which is appended to those letters dated August 9, 2023, and October 30, 2023 -- authored by CBIA and others – regarding “Comments on State Responsibility Area Fire Hazard Severity Zones, dated June 15, 2023, and September 29, 2023”). RMV wholeheartedly supports and endorses the draft map revision protocol prepared by CBIA, and appreciates CAL FIRE's courtesy in carefully evaluating the proposal.

Response: OSFM evaluated each comment, no changes were made to the regulation in response to this comment. Additionally, when the comment was made it was outside the scope of the changes made to the map for which public comment was being accepted. The non-wildland boundaries depicted in the comment are from an older version and does not reflect the edits that have been made in this area as a result of public comment and posted in the publicly available data package. 1. Cow Camp Road and Los Patrones Parkway - the non-wildland extent was adjusted in this location after the second round of public comment, and resulted in the small area to the N that changed from Very High to High, as shown on the North side of Figure 2 in this comment. 2. Orchards Adjacent to the Village of Rienda - the non-wildland extent was adjusted in this location after the second round of public comments, resulting in a shift in the extent of FHSZ buffers to the N, as shown on the East side of Figure 2 in this comment. 3. Orchard Classification within the Village of Esencia - The non-wildland extent was adjusted in this area after the second round of public comment. Due to the small size of the edit, and the closeness of the SRA boundary to the adjusted non-wildland edge, there was no change to FHSZ within the SRA in this location. 4. Northern Phase of the Village of Esencia - North Esencia is already modeled as non-wildland, following an edit that was done after CAL FIRE unit review. FHSZ in this area is determined by buffer, and due to very high hazard in the surrounding wildland on three sides the entire area is designated Very High FHSZ. Consistent zoning methodology are being used for Ladera Ranch and the southern portion of the Village of Esencia, however these areas are in LRA and are therefore not included/visible in the SRA FHSZ maps.

ID 3774, Comment: Aaron Duncan Fire Chief & Director of Emergency Services Fire Department Headquarters 5642 Victor Street • Bakersfield, CA 93308 • www.kerncountyfire.org Telephone 661-391-7000 • FAX 661-399-2915 TTY Relay 800-735-2929 Daniel Berlant State Fire Marshal/Deputy Director California Department of Forestry and Fire Protection 715 P Street Sacramento, CA 95814 Fire Hazard Severity Zone Update Public Comment Period Dear Director Berlant, The Kern County Fire Department has been working with the Office of the State Fire Marshall and CAL FIRE on the update of the Fire Hazard Severity Zone maps over the course of

the past year. We appreciate the diligence the State has taken with the process to accommodate additional public comment and respect the State's decision to update the 2007 maps. We value the public outreach and consideration of the received public comment that has taken place to date. The past year has shown that the accuracy of the maps may become varied as a more in-depth look at the modeling used and specific site characteristics are taken into consideration, which has led to current adjustments. We encourage the Office of the State Fire Marshall to consider alternative modeling techniques that represent the most probable of scenarios rather than the worst-case scenarios. Continuing to produce maps that are based upon the worst-case scenario as the baseline for determining fire hazard may not present an accurate look at the true fire hazard experienced in the landscape. Our hope is that this and future Fire Hazard Severity maps become more consistent with on the ground conditions. We appreciate the time and consideration of this request during this public comment period. Sincerely, Aaron Duncan Fire Chief

Response: OSFM evaluated each comment, no changes were made to the regulation in response to this comment. Additionally, when the comment was made it was outside the scope of the changes made to the map for which public commented was being accepted. No changes were made to the regulation in response to this comment. FHSZ is a map designed to require mitigations to limit damage to people and property. Historical evidence suggests that damage to homes and other infrastructure from fire is associated with more extreme fire behavior and burning conditions. We validated our choice for threshold weather observations by checking against the weather that occurred during historic damaging fires. The weather data used isn't just the very rare once in 100 years events. It amounts to the worst 10% of days (so 36.5 days per year on average) and then on those days the most severe 5% of hours, which comes out to an average of 44 hours per year. Over a 100-year period these conditions would be expected to occur for 4400 hours total, across 3650 days.

Comment(s): Irrelevant

Overview: General Comments & Questions – The Office of the State Fire Marshal received 35 comments that were not related to Fire Hazard Severity Zones. The comment ID's that relate to those comments are as followed below: [173, 292, 573, 759, 812, 922, 1048, 1072, 1130, 1428, 1574, 1640, 1658, 1679, 1907, 3346, 3351, 3585, 427, 553, 748, 817, 829, 834, 1130, 1402, 1408, 1415, 1679, 2167, 2705, 2740, 2958, 3065, 3645].

Response: In accordance with Government Code Section 11346.9(a)(3), this comment is irrelevant because it is not specifically directed at the proposed modifications to the text, documents incorporated, or documents relied upon and noticed.

Comment(s): Untimely

The Office of the State Fire Marshal received 2 comments that requested that we look up their address. The comment ID's that relate to those comments are as followed: [1661, 1595].

Response: This comment is untimely as it was received outside of the comment period. You can search by address to find your current designation on the web at: osfm.fire.ca.gov/FHSZ

The Office of the State Fire Marshal received 1 comment that related to the GIS Data and availability. The comment ID that relates to that comment is as followed: [77].

Response: This comment is untimely as it was received outside of the comment period. The data inputs used to develop the Fire Hazard Severity Zones are identified in the Initial Statement of Reasons (ISOR) Title 19 Development (ca.gov). CAL FIRE has developed an additional data package which consists of sequential modeling steps, including any data inputs that were not already publicly available and referenced in the ISOR. The data package encompasses 34 spatial datasets and 8 tables, provided in raster, polygon, and table format. These datasets are formatted for Esri ArcGIS software, except for four tables provided in Excel. Ten of the datasets are updated versions used to produce an edited SRA FHSZ map following the public comment period that ended April 4, 2023. Upon formal adoption of the FHSZ map, the final SRA FHSZ geospatial data file will become available. The data package is available on the FHSZ website Fire Hazard Severity Zones (ca.gov) under the science and methods banner.

The Office of the State Fire Marshal received 2 comments after the August 4, 2023, deadline and 10-day grace period. The comment ID's that relate to those comments are as followed: [3685, 3662].

Response:

3685: This comment is untimely as it was received outside of the comment period.

Public Resources Code 4202 requires the State Fire Marshal to classify lands within state responsibility areas into fire hazard severity zones. Each zone shall embrace relatively homogeneous lands and shall be based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have been identified by the department as a major cause of wildfire spread.

3662: This comment is untimely as it was received outside of the comment period. The State Fire Marshal notified each County Board of Supervisors and held a public hearing in each county with a Fire Hazard Severity Zone designation in the State Responsibility Area as required by

Public Resources Code 4203. For all public comment periods and extensions, all requirements of the Administrative Procedure Act (APA) were followed.

The Office of the State Fire Marshal received 10 comments after the April 4, 2023, deadline and the 10-day grace period. The comment ID's that relate to those comments are as followed: [2849, 2860, 2865, 2872, 2880, 2911, 2913, 2914, 2915, 2919].

Response:

2860, 2915: This comment is untimely as it was received outside of the comment period. The CAL FIRE reviewed the zoning and underlying data in this area and determined that hazard was appropriately classified based on the vegetation composition and burn probability.

2911: This comment is untimely as it was received outside of the comment period. CAL FIRE's maps are intended to drive local planning decisions, not insurance decisions. Under Commissioner Lara's new regulation finalized in October 2022, insurance companies must provide discounts for wildfire safety actions such as community mitigation and home-hardening, which CAL FIRE's maps do not assess. In addition, insurance companies are already using risk analysis tools and models that go beyond CAL FIRE's proposed maps in determining what properties they will underwrite. Commissioner Lara's new wildfire safety regulation will help increase access to insurance by promoting wildfire safety across the state. Reducing wildfire risks throughout the state is the primary way we can make insurance more available and affordable, and our regulation is a major step towards that goal. CAL FIRE's maps support that goal through improving public education about hazard and the need for safety preparation. Home hardening is considered a risk reduction method to reduce the impacts of the hazard. Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are to impacts. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk (such as the California Wildfire Mitigation Program).

2849: This comment is untimely as it was received outside of the comment period. Fire hazard reflects the potential for damage to occur to vulnerable resources or assets but does not include a measure of how vulnerable resources are. FHSZ is a tool that can help identify where actions should be taken to mitigate fire risk. Higher hazard implies that compared to other areas of the state, a fire is either more likely to occur, would occur with more intense fire behavior, or both. Because FHSZ is intended for long term planning purposes it does not account for short-term fire mitigation efforts such as fuel reduction or defensible space that may change over the long term. CAL FIRE's maps are intended to drive local planning decisions, not insurance decisions. Under Commissioner Lara's new regulation finalized in October 2022, insurance companies must provide discounts for wildfire safety actions such as community mitigation and home-hardening, which CAL FIRE's maps do not assess. In addition, insurance companies are already using risk analysis tools and models that go beyond CAL FIRE's proposed maps in determining what properties they will underwrite. Commissioner Lara's new wildfire safety regulation will help increase access to insurance by promoting wildfire safety across the state. Reducing wildfire risks throughout the state is the primary way we can make insurance more available and affordable, and our regulation is a major step towards that goal. CAL FIRE's maps support that goal through improving public education about hazard and the need for safety preparation.

2919: This comment is untimely as it was received outside of the comment period. For many years, insurance companies have been using alternate wildfire risk tools for determining where they will write and renew policies, and how much premium to charge a policyholder, not the Fire

Hazard Severity Zone maps. Therefore, a change in designation on the maps for a single homeowner is unlikely to affect their insurance. The reality is that more accurate risk information enables homeowners and communities to reduce their wildfire risks, and Commissioner Lara's new wildfire mitigation regulation clarifies what actions you should take to reduce wildfire risks. Once that regulation is fully implemented, if a homeowner or business owner takes those risk mitigation actions, they will be able to see a discount in their insurance premium. Recent fires (through 2020) do factor into burn probability in the model, as they reflect trends in fire likelihood within similar climate and fuel groupings. Like other temporary mitigations such as fuel treatments, the effect of wildfires on fuel loads is limited due to vegetation regrowth or type conversion. Because some of the most critical fire safety regulations involve construction materials and methods, which are influential over the entire life of a structure, FHSZ utilizes fuel conditions that reflect the maximal hazard condition likely to occur over a 30-50 year time horizon.

2872, 2914: This comment is untimely as it was received outside of the comment period. The fire hazard severity model for wildland fire has two key elements: probability of an area burning and expected fire behavior under extreme fuel and weather conditions. The zones reflect areas that have similar burn probabilities and fire behavior characteristics. The factors considered in determining fire hazard within wildland areas are fire history, flame length, terrain, local weather, and potential fuel over a 50-year period. Outside of wildlands, the model considers factors that might lead to buildings being threatened, including terrain, weather, urban vegetation cover, blowing embers, proximity to wildland, fire history, and fire hazard in nearby wildlands. FHSZs are not a structure loss model, as key information regarding structure ignition (such as roof type, etc.) is not included.

2865: This comment is untimely as it was received outside of the comment period. The Office of the State Fire Marshal posted for public review and comment detailed modeling methods and intermediate data sets during the June 26, 2023, and October 16, 2023 public comment periods.

2913: This comment is untimely as it was received outside of the comment period. The roads as shown are the product of our software's basemap – OSFM do not have control over them. Fire history is incorporated into the model though it is done through the actual location of the fire perimeter. The mislabeled road in this case does not affect the model output.

The Office of the State Fire Marshal received 1 comment that related to the Defensible Space information and where to find it. The comment ID that relates to that comment is as followed: [430].

Response: This comment is untimely as it was received outside of the comment period. Can use website, <https://www.fire.ca.gov/dspace>. You can also contact CALFIREDSISupport@fire.ca.gov for additional information.

The Office of the State Fire Marshal received 1 comment that related to Federal Land and how it is classified in zone classifications. The comment ID that relates to that comment is as followed: [1019].

Response: This comment is untimely as it was received outside of the comment period. The State Fire Marshal does not designate Fire Hazard Severity Zones in Federal responsibility Area. Public Resources Code sections 4202 and 4203 require the State Fire Marshal to classify and designate the lands within the State Responsibility Area.

The Office of the State Fire Marshal received 9 comments that requested Fire Hazard Severity Zone Information. The comment ID's that relate to those comments are as followed: [3027, 2735, 1635, 1634, 99, 31, 97, 83, 82].,

Response:

3027, 2735, 1635, 1634: These comments are untimely as it was received outside of the comment period. The data inputs used to develop the Fire Hazard Severity Zones are identified in the Initial Statement of Reasons (ISOR) Title 19 Development (ca.gov). CAL FIRE has developed an additional data package which consists of sequential modeling steps, including any data inputs that were not already publicly available and referenced in the ISOR. The data package encompasses 34 spatial datasets and 8 tables, provided in raster, polygon, and table format. These datasets are formatted for Esri ArcGIS software, except for four tables provided in Excel. Ten of the datasets are updated versions used to produce an edited SRA FHSZ map following the public comment period that ended April 4, 2023. Upon formal adoption of the FHSZ map, the final SRA FHSZ geospatial data file will become available. The data package is available on the FHSZ website Fire Hazard Severity Zones (ca.gov) under the science and methods banner.

99: This comment is untimely as it was received outside of the comment period. The area in question is indeed State Responsibility Area (SRA). It has been so since the 2000 5-year review. SRA reviews are conducted on 5-year cycles. CAL FIRE has cataloged the geospatial data of each 5-year review change since 1995. In reviewing the data, it appears the area in Tiburon became SRA during the 2000 review. The change code (the reason for the change in responsibility area) is noted as 'USE - landuse, typically loss of watershed value due to a combination of crops and development.' This coding is normally, as is implied, for loss of watershed value and a reason for areas leaving SRA. One can infer that, due to this coding, during the 2000 review this area was cited as having watershed value that meets the thresholds for coming under state responsibility. Unfortunately, no other documentation can be found around this change. SRA is a standalone dataset. The current version can be viewed here and downloaded here. Upon review you will see that there is SRA in the Tiburon Fire District. See image below, where yellow is SRA: The next 5-year review is scheduled to take effect in 2025. The Pre-Fire Planning program will solicit changes from CAL FIRE units and contract counties through 2024 to take effect the following year.

31: This comment is untimely as it was received outside of the comment period. The Office of the State Fire Marshal has collected all comments and will respond to your comment. All comments will be collected, reviewed, summarized, and responded to in the final regulatory submission to the Office of Administrative Law.

97: This comment is untimely as it was received outside of the comment period. The fire hazard severity model for wildland fire has two key elements: probability of an area burning and expected fire behavior under extreme fuel and weather conditions. The zones reflect areas that have similar burn probabilities and fire behavior characteristics. The factors considered in determining fire hazard within wildland areas are fire history, flame length, terrain, local weather, and potential fuel over a 50-year period. Outside of wildlands, the model considers factors that might lead to buildings being threatened, including terrain, weather, urban vegetation cover, blowing embers, proximity to wildland, fire history, and fire hazard in nearby wildlands. FHSZs are not a structure loss model, as key information regarding structure ignition (such as roof type, etc.) is not included. In non-wildland areas, zone edges occur based on distance to the wildland edge. Because hazard in these areas is largely determined by incoming embers from

adjacent wildland, urban areas that are similar in vegetation type and housing density may have a change in FHSZ class as the distance to the wildland edge increases. Areas immediately adjacent to wildland receive the same FHSZ score as that wildland where fire originates, and the model then produces lower scores as the distance to wildland edge increases. In wildland areas, zone edges are a result of the way zones are delineated. Specifically, zones represent areas of similar slope and fuel potential. Zone boundaries divide zones based on geographic and vegetation features that align with fire hazard potential; although, at a local scale, it may appear that the immediate area is similar on both sides of the edge. The class value within a zone is based on the average hazard score across the whole zone, so areas that are in the same zone but not immediately adjacent to a local area can have an influence on the final zone classification.

83, 82: These comments are untimely as it was received outside of the comment period. You can be updated on all items related to FHSZ by visiting our website at osfm.fire.ca.gov/FHSZ

The Office of the State Fire Marshal received 1 comment that asked about general information related to Fire Hazard Severity Zone. The comment ID that relates to that comment is as followed: [2198].

Response: This comment is untimely as it was received outside of the comment period. This was updated, and can now be accessed at osfm.fire.ca.gov/FHSZ

The Office of the State Fire Marshal received 4 comments that were related to Local Responsibility. The comment ID's that relate to those comments are as followed: [1812, 1518, 364, 100].

Response: These comments are untimely as it was received outside of the comment period. The proposed regulation only designates Fire Hazard Severity Zones in the State responsibility Area. Once the regulation is effective, the identification process for the Local Responsibility Area will occur.

The Office of the State Fire Marshal received 6 comments that were related when public hearings were being held and how they were being held. The comment ID's that relate to those comments are as followed: [2151, 580, 564, 423, 411, 205].

Response:

2151, 580, 423: These comments are untimely as it was received outside of the comment period. The State Fire Marshal notified each County Board of Supervisors and held a public hearing in each county with a Fire Hazard Severity Zone designation in the State Responsibility Area as required by Public Resources Code 4203. For all public comment periods and extensions, all requirements of the Administrative Procedure Act (APA) were followed.

564, 411: These comments are untimely as it was received outside of the comment period. The Office of the State Fire Marshal followed PRC 4203(b) which requires that a public hearing be held in each county with a designated Fire Hazard Severity Zone.

205: This comment is untimely as it was received outside of the comment period. Meeting was held at College of the Canyon on 1/14/23 at 10AM. Meeting address is 26455 Rockwell Canyon Road, Room 258 Santa Clarita, 91355

The Office of the State Fire Marshal received 6 comments that asked model technical questions. The comment ID's that relate to those comments are as followed: [8, 406, 339, 293, 257, 70].

Response:

8: This comment is untimely as it was received outside of the comment period. All areas in State Responsibility Area, including water bodies, require a fire hazard severity zone designation. The 2007 FHSZ maps zoned all water as moderate by default. In the 2022 FHSZ model we added a buffer of FHSZ from the surrounding wildland into water bodies to account for potential threat of embers to buildings on docks and house boats, as well as variation in reservoir height that occurs with drought.

406, 339: These comments are untimely as it was received outside of the comment period.. The Fire Hazard Severity Zone map evaluates “hazard,” not “risk”. The map is like flood zone maps, where lands are described in terms of the probability level of a particular area being inundated by floodwaters, and not specifically prescriptive of impacts. “Hazard” is based on the physical conditions that create a likelihood and expected fire behavior over a 30 to 50-year period without considering mitigation measures such as home hardening, recent wildfire, or fuel reduction efforts. “Risk” is the potential damage a fire can do to the area under existing conditions, accounting for any modifications such as fuel reduction projects, defensible space, and ignition resistant building construction.

293: This comment is untimely as it was received outside of the comment period. In non-wildland areas, zone edges occur based on distance to the wildland edge. Because hazard in these areas is largely determined by incoming embers from adjacent wildland, urban areas that are similar in vegetation type and housing density may have a change in FHSZ class as the distance to the wildland edge increases. Areas immediately adjacent to wildland receive the same FHSZ score as that wildland where fire originates, and the model then produces lower scores as the distance to wildland edge increases. In wildland areas, zone edges are a result of the way zones are delineated. Specifically, zones represent areas of similar slope and fuel potential. Zone boundaries divide zones based on geographic and vegetation features that align with fire hazard potential; although, at a local scale, it may appear that the immediate area is similar on both sides of the edge. The class value within a zone is based on the average hazard score across the whole zone, so areas that are in the same zone but not immediately adjacent to a local area can have an influence on the final zone classification.

257, 70: These comments are untimely as it was received outside of the comment period. The Office of the State Fire Marshal posted for public review and comment detailed modeling methods and intermediate data sets during the June 26, 2023, and October 16, 2023 public comment periods. The fire hazard severity model for wildland fire has two key elements: probability of an area burning and expected fire behavior under extreme fuel and weather conditions. The zones reflect areas that have similar burn probabilities and fire behavior characteristics. The factors considered in determining fire hazard within wildland areas are fire history, flame length, terrain, local weather, and potential fuel over a 50-year period. Outside of wildlands, the model considers factors that might lead to buildings being threatened, including terrain, weather, urban vegetation cover, blowing embers, proximity to wildland, fire history, and fire hazard in nearby wildlands. FHSZs are not a structure loss model, as key information regarding structure ignition (such as roof type, etc.) is not included. Public Resources Code 4202 requires the State Fire Marshal to classify lands within state responsibility areas into fire hazard severity zones. Each zone shall embrace relatively homogeneous lands and shall be based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have

been identified by the department as a major cause of wildfire spread. Public comment on the map was received under Public Resources Code 4203 which requires the State Fire Marshal to notify each County Board of Supervisors and hold a public hearing in each county with a Fire Hazard Severity Zone designation in the State Responsibility Area, with an additional public hearing added in Sacramento County. When the office of the State Fire Marshal provided public comment periods and extensions, all requirements of the Administrative Procedure Act (APA) were followed.

The Office of the State Fire Marshal received 10 comments that requested the GIS/Shapefile Data and the ability to download this information. The comment ID's that relate to those comments are as followed: [2771, 962, 879, 874, 586, 269, 264, 257, 235, 226].

Response: This comment is untimely as it was received outside of the comment period. The data inputs used to develop the Fire Hazard Severity Zones are identified in the Initial Statement of Reasons (ISOR) Title 19 Development (ca.gov). CAL FIRE has developed an additional data package which consists of sequential modeling steps, including any data inputs that were not already publicly available and referenced in the ISOR. The data package encompasses 34 spatial datasets and 8 tables, provided in raster, polygon, and table format. These datasets are formatted for Esri ArcGIS software, except for four tables provided in Excel. Ten of the datasets are updated versions used to produce an edited SRA FHSZ map following the public comment period that ended April 4, 2023. Upon formal adoption of the FHSZ map, the final SRA FHSZ geospatial data file will become available. The data package is available on the FHSZ website Fire Hazard Severity Zones (ca.gov) under the science and methods banner.

The Office of the State Fire Marshal received 5 comments that requested assistance or information regarding the interactive map. The comment ID's that relate to those comments are as followed: [361, 356, 195, 77, 52].

Response:

195, 77: These comments are untimely as it was received outside of the comment period. You can search by address to find your current designation on the web at: osfm.fire.ca.gov/FHSZ

361: This comment is untimely as it was received outside of the comment period. Those are representative of the three zone, Moderate (Yellow) High (Orange), and Very High (Red)

356: This comment is untimely as it was received outside of the comment period. The Office of the State Fire Marshal has provided an interactive map throughout the process called SRA FHSZ Rollout Application on our website at <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=8a08fca5c54f4e6987800f160e2cf9b2>.

52: This comment is untimely as it was received outside of the comment period. San Luis Obispo Map was uploaded to the website on 12/20/22.

The Office of the State Fire Marshal received 4 comments that requested the public hearings be held in a virtual or hybrid manner. The comment ID's that relate to those comments are as followed: [1123, 584, 580, 365].

Response: These comments are untimely as it was received outside of the comment period. The Office of the State Fire Marshal followed PRC 4203(b) which requires that a public hearing be held in each county with a designated Fire Hazard Severity Zone.

Appendices

Appendices A

Email ID's: 12/16/23– 4/4/23

36, 41, 42, 44, 45, 46, 52, 54, 69, 70, 77, 78, 79, 80, 82, 83, 86, 89, 90, 94, 97, 99, 100, 101, 109, 111, 117, 123, 173, 193, 195, 196, 201, 202, 203, 204, 205, 207, 210, 213, 221, 223, 224, 226, 231, 235, 236, 240, 244, 245, 248, 250, 257, 259, 264, 266, 269, 270, 272, 274, , 75, 276, 280, 281, , 282, 284, 286, 287, 292, 293, 298, 300, 327, 339, 343, 356, 361, 364, 365, 366, 375, 377, 396, 399, 406, 409, 411, 414, 415, 416, 417, 418, 419, 421, 422, 423, 424, 426, 427, 429, 430, 432, 433, 434, 435, 436, 437, 438, 440, 441, 442, 445, 446, 447, 449, 451, 452, 454, 456, 459, 460, 476, 489, 494, 497, 498, 499, 515, 516, 522, 534, 537, 541, 542, 543, 544, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 561, 562, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 576, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 593, 594, 595, 596, 598, 599, 601, 603, 604, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 664, 668, 669, 670, 671, 672, 673, 675, 677, 678, 679, 680, 681, 682, 684, 687, 688, 689, 690, 692, 693, 699, 701, 702, 703, 704, 717, 718, 719, 720, 721, 722, 723, 730, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 745, 746, 747, 748, 753, 755, 756, 757, 758, 759, 760, 761, 762, 763, 766, 767, 771, 772, 778, 779, 789, 790, 791, 793, 795, 796, 802, 803, 805, 808, 810, 811, 812, 813, 815, 816, 817, 820, 821, 822, 823, 824, 825, 826, 827, 829, 830, 834, 847, 848, 858, 861, ,862, 863, 864, 865, 866, 873, 874, 876, 878, 879, 892,894, 901, 903, 904, 906, 907, 908, 909, 910, 912, 918, 919, 920, 921, 922, 923, 924, 925, 927, 928, 936, 946, 947, 948, 949, 950, 951, 962, 966, 970, 976, 977, 978, 983, 987, 989, 990, 993, 994, 997, 998, 999, 1000, 1001, 1002, 1003, 1004, 1005, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1019, 1020, 1021, 1022, 1023, 1024, 1025, 1026, 1028, 1029, 1030, 1033, 1034, 1036, 1037, 1039, 1041, 1042, 1043, 1044, 1046, 1047, 1048, 1049, 1050, 1052, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1064, 1067, 1069, 1070, 1072, 1073, 1074, 1075, 1076, 1078, 1079, 1080, 1081, 1086, 1087, 1088, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1100, 1102, 1103, 1104, 1105, 1106, 1108, 1109, 1110, 1111, 1112, 1113, 1114, 1115, 1117, 1118, 1120, 1122, 1123, 1125, 1126, 1128, 1129, 1130, 1133, 1134, 1135, 1137, 1138, 1139, 1140, 1142, 1144, 1145, 1146, 1148, 1149, 1151, 1153, 1154, 1219, 1220, 1221, 1223, 1224, 1225, 1228, 1229, 1232, 1233, 1235, 1236, 1237, 1242, 1243, 1244, 1246, 1247, 1249, 1250, 1251, 1253, 1254, 1256, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1267, 1268, 1269, 1270, 1271, 1272,, 1275, 1276, 1278, 1279, 1280, 1281, 1282, 1284, 1291, 1293, 1296, 1298, 1299, 1300, 1301, 1302, 1304, 1305, 1306, 1307, 1308, 1309, 1310, 1312, 1313, 1315, 1316, 1317, 1318, 1320, 1321, 1322, 1323, 1324, 1325, 1326, 1327, 1328, 1329, 1330, 1331, 1332, 1333, 1334, 1336, 1337, 1338, 1340, 1342, 1344, 1345, 1346, 1347, 1348, 1349, 1350, 1351, 1352, 1353, 1354, 1355, 1356, 1358, 1359, 1360, 1361, 1362, 1364, 1365, 1366, 1367, 1368, 1369, 1371, 1372, 1373, 1374, 1375, 1376, 1377, 1378, 1379, 1380, 1381, 1390, 1391, 1404, 1405, 1443, 1444, 1447, 1449, 1451, 1452, 1456, 1457, 1459, 1460, 1462, 1467, 1468, 1471, 1475, 1476, 1477, 1535, 1536, 1537, 1538, 1539, 1540, 1541, 1542, 1544, 1546, 1547, 1548, 1549, 1551, 1552, 1553, 1555, 1556, 1557, 1558, 1559, 1561, 1562, 1563, 1564, 1565, 1566, 1567, 1572, 1608, 1609, 1610, 1612, 1613, 1614, 1615, 1617, 1618, 1619, 1620, 1621, 1622, 1623, 1625, 1626, , 1641, 1642, 1672, 1687, 1688, 1689, 1690, 1691, 1744, 1745, 1746, 1747, 1748, 1749, 1750, 1751, 1752, 1753, 1754, 1755, 1756, 1758, 1759, 1760, 1761, 1762, 1763, 1765, 1766, 1767, 1799, 1800, 1801, 1802, 1803, 1826, 1827, 1829, 1830, 1831, 1832, 1833, 1834, 1835, 1836, 1837, 1839, 1840, 1841, 1842, 1843, 1844, 1845, 1846, 1847,

1848, 1849, 1850, 1851, 1870, 1871, 1872, 1873, 1874, 1913, 1914, 1915, 1916, 1917, 1918, 1919, 1920, 1921, 1922, 1923, 1924, 1925, 1926, 1927, 1928, 1929, 1930, 1931, 1932, 1933, 1934, 1935, 1936, 1937, 1938, 1939, 1940, 1941, 1943, , 1946, 1947, 1948, 1949, 1951, 1961, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2075, 2077, 2078, 2079, 2081, 2082, 2083, 2084, 2087, 2094, 2095, 2096, 2097, 2100, 2101, 2102, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2124, 2125, 2126, 2130, 2131, 2133, 2377, 2378, 2379, 2381, 2382, 2384, 2385, 2387, 2389, 2390, 2391, 2392, 2393, , 399, 2400, 2401, 2402, 2404, 2405, 2406, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2433, 2434, 2436, 2437, 2438, 2439, 2440, 2442, 2443, 2446, 2449, 2450, 2451, 2453, 2454, 2455, 2459, 2460, 2462, 2463, 2464, 2465, 2466, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2484, 2486, 2487, 2488, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2498, 2499, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2527, 2528, 2529, 2531, 2533, 2534, 2535, 2536, 2537, 2538, 2541, 2542, 2543, 2545, 2546, 2547, 2548, ,2549, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2565, 2566, 2567, 2579, 2580, 2583, 2584, 2585, 2588, 2589, 2590, 2591, 2597, 2599, 2601, 2602, 2603, 2604, 2606, 2609, 2610, 2611, 2612, 2613, 2616, 2617, 2618, 2619, 2620, 2624, 2627, 2628, 2633, 2635, 2645, 2687, 2689, 2691, 2694, 2696, 2698, 2699, 2760, 2761, 2762, 2763, 2764, 2765, 2766, 2767, 2768, 2769, 2770, 2773, 2774, 2775, 2776, 2778

Appendices B

Email ID's: 6/26/2023 – 8/8/2023

2932, 2933, 2935, 2953, 2956, 2958, 2984, 2988, 2989, 3009, 3010, 3027, 3030, 3050, 3052, 3053, 3055, 3057, 3059, 3065, 3070, 3091, 3092, 3094, 3099, 3109, 3111, 3115, 3136, 3139, 3142, 3143, 3146, 3147, 3149, 3150, 3151, 3153, 3154, 3155, 3157, 3159, 3160, 3162, 3163, 3186, 3196, 3201, 3202, 3206, 3227, 3228, 3229, 3230, 3231, 3232, 3237, 3240, 3265, 3266, 3267, 3272, 3275, 3276, 3280, 3281, 3284, 3286, 3339, 3340, 3343, 3344, 3345, 3346, 3347, 3348, 3349, 3350, 3351, 3352, 3353, 3354, 3355, 3356, 3357, 3358, 3359, 3360, 3361, 3362, 3363, 3364, 3365, 3366, 3367, 3368, 3369, 3370, 3371, 3372, 3373, 3374, 3375, 3376, 3377, 3378, 3379, 3380, 3381, 3382, 3383, 3384, 3385, 3386, 3387, 3388, 3389, 3390, 3391, 3392, 3393, 3394, 3395, 3402, , 404, 3406, 3409, 3431, 3445, 3449, 3452, 3454, 3466, 3468, 3471, 3473, 3489, 3497, 3538, 3545, 3546, 3547, 3549, 3553

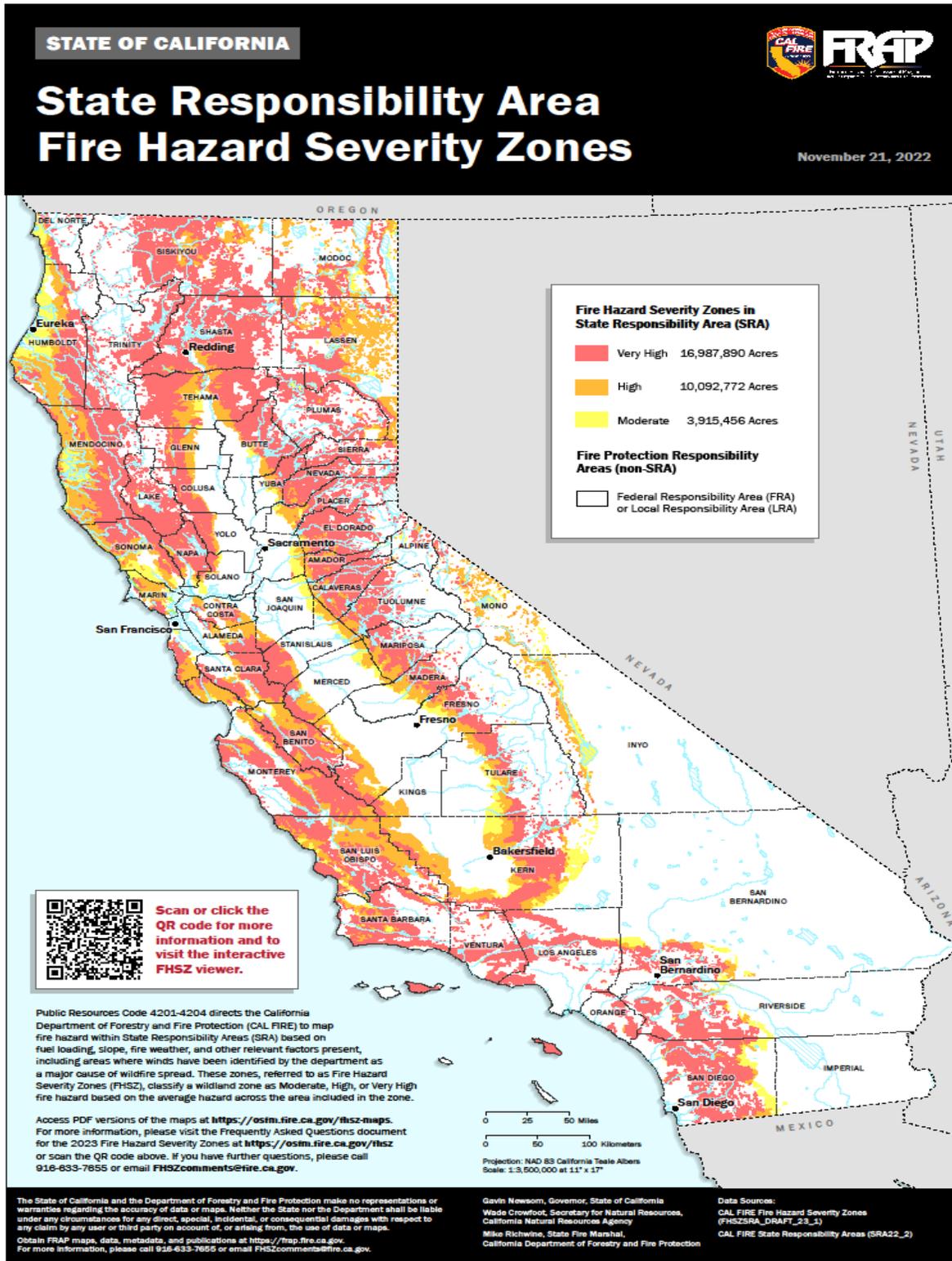
Appendices C

Email ID's: 10/13/2023 – 10/30/2023

3710, 3714, 3719, 3720, 3721, 3723, 3730, 3737, 3738, 3739, 3741, 3744, 3745, 3774, 3777,
3778, 3780, 3786, 3792, 3795, 3796, 3797, 3798, 3799, 3808

Appendices D

State Responsibility Area Fire Hazard Severity Zones: November 21, 2022



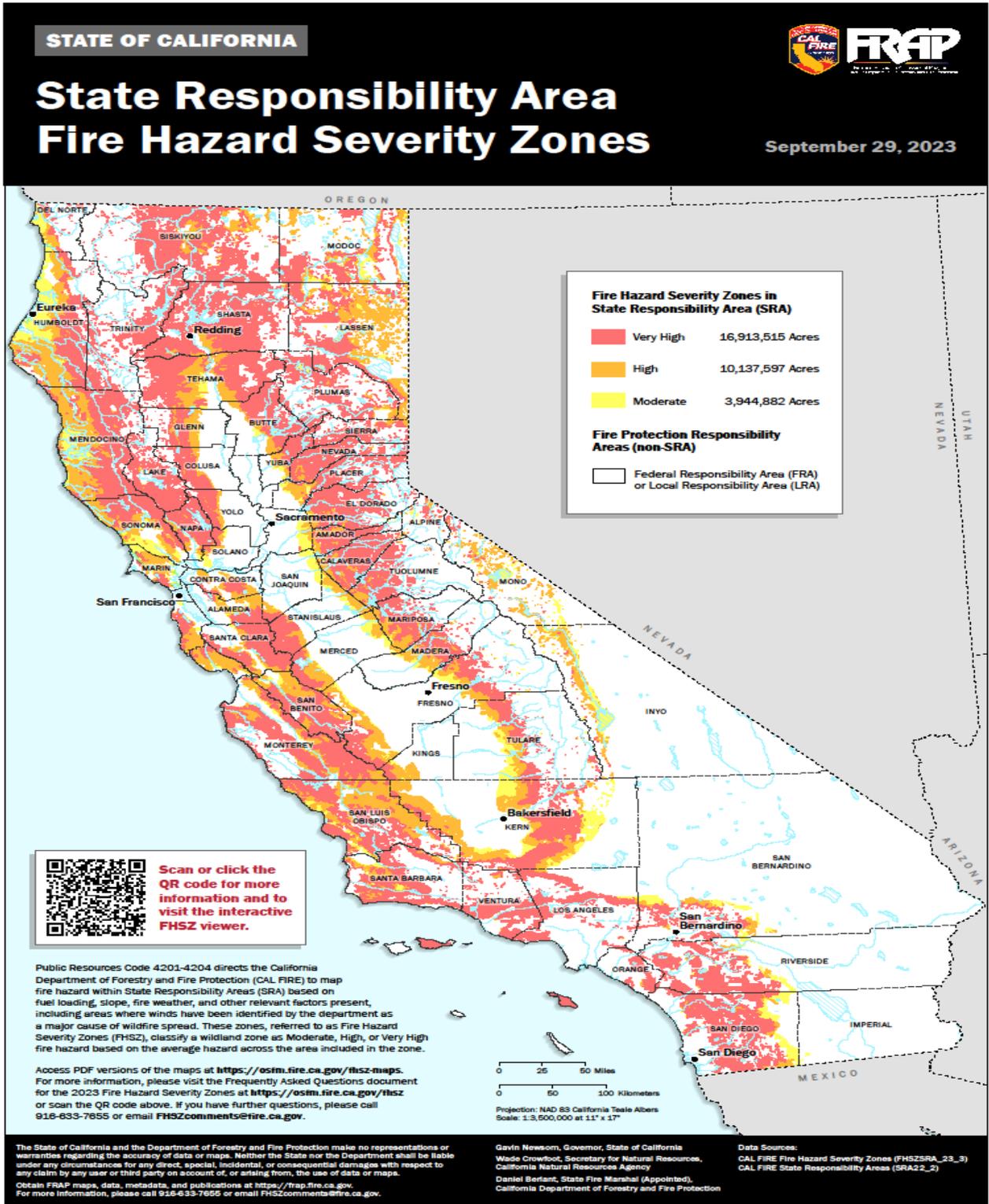
Appendices E

State Responsibility Area Fire Hazard Severity Zones: June 15, 2023



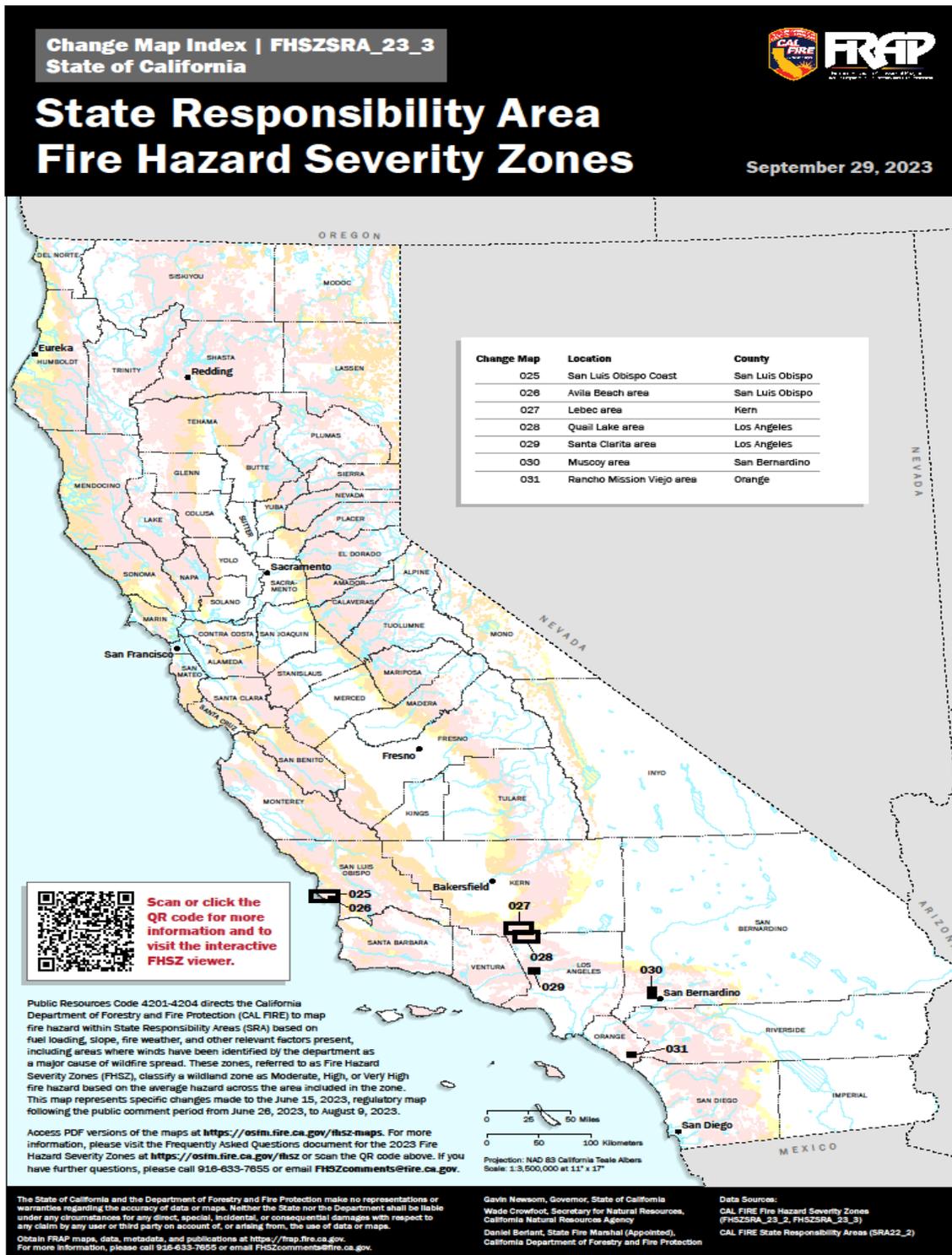
Appendices F

State Responsibility Area Fire Hazard Severity Zones: September 29, 2023

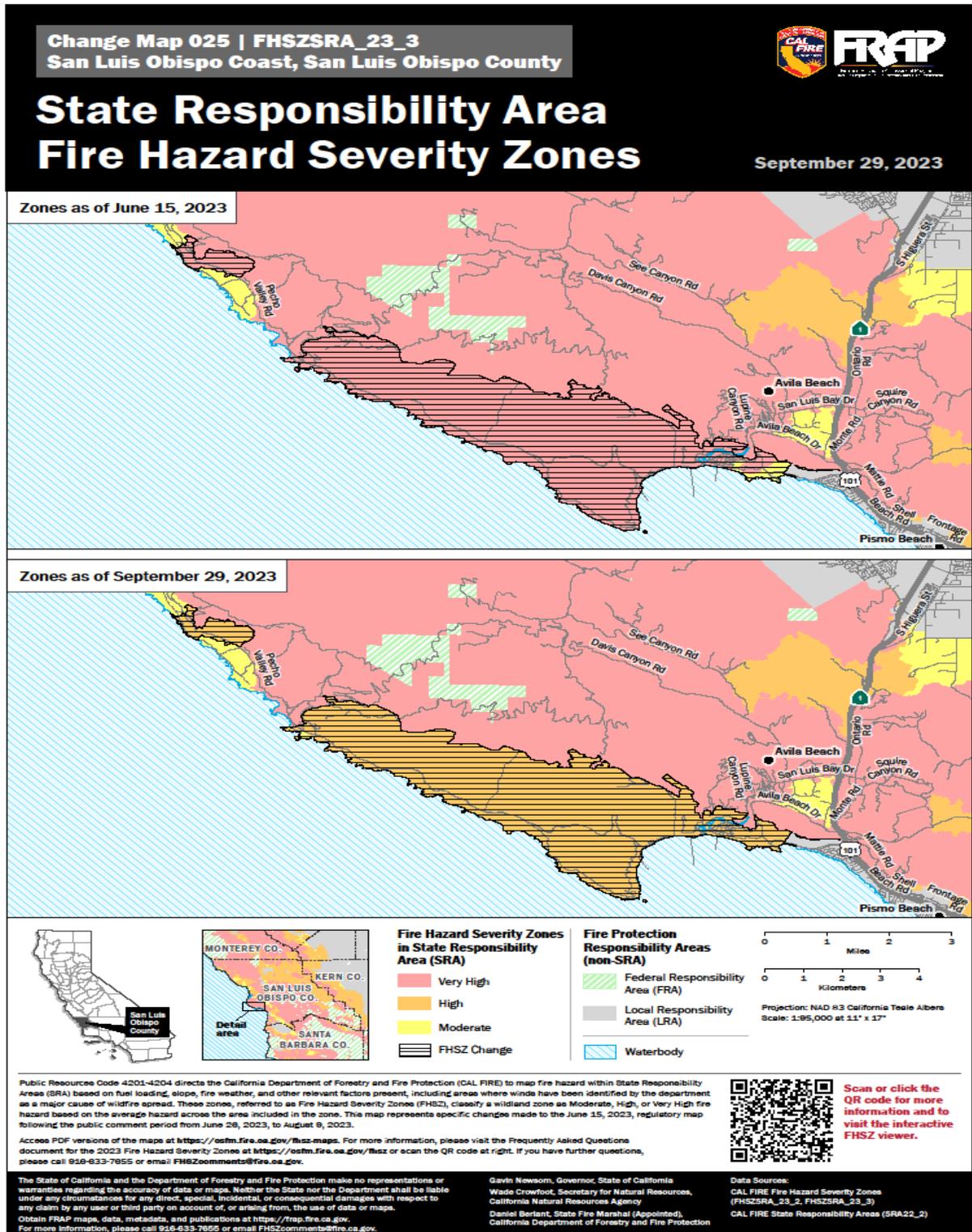


Appendices G

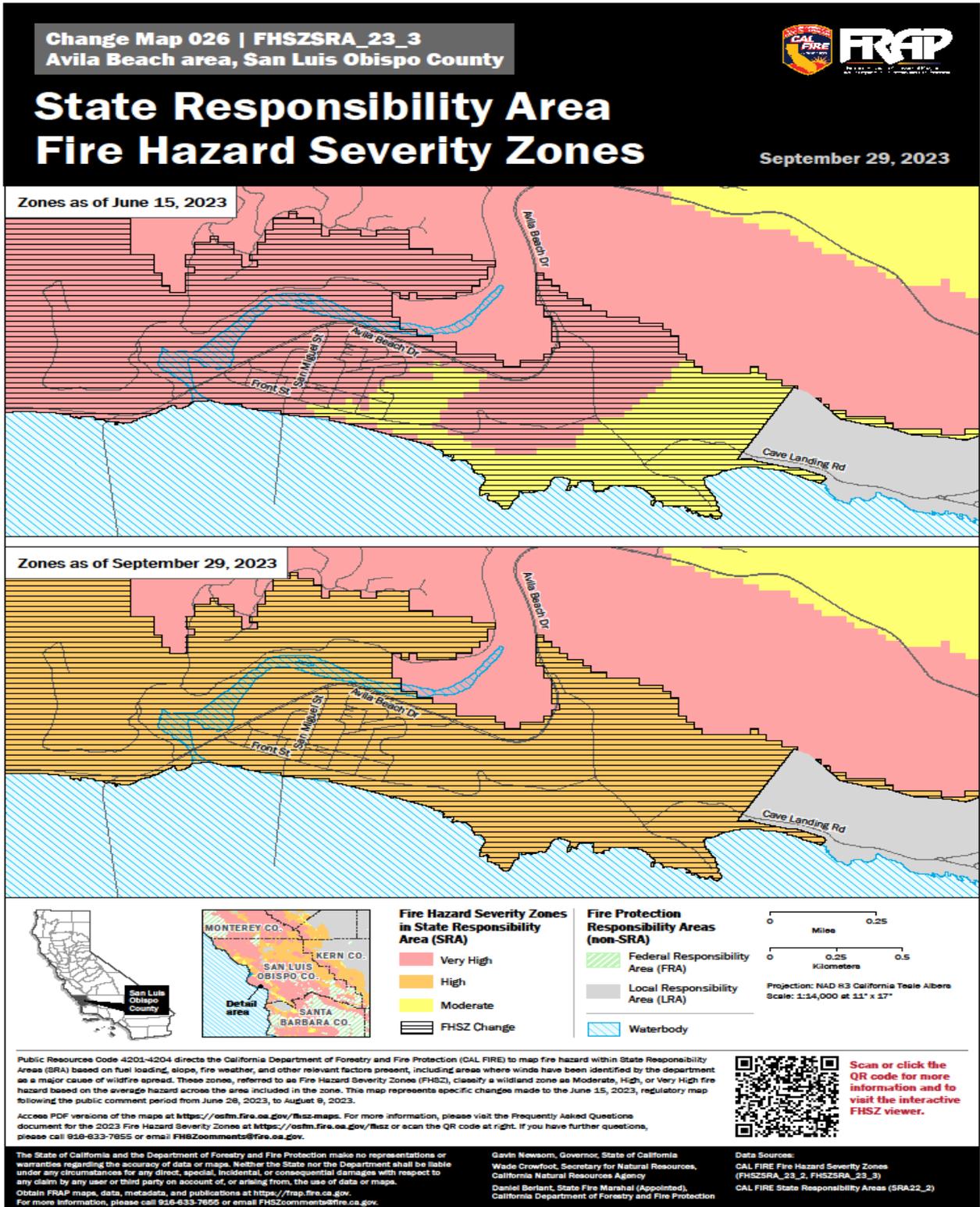
Change Map Package: Map of State Responsibility Area Fire Hazard Severity Zones: September 29, 2023



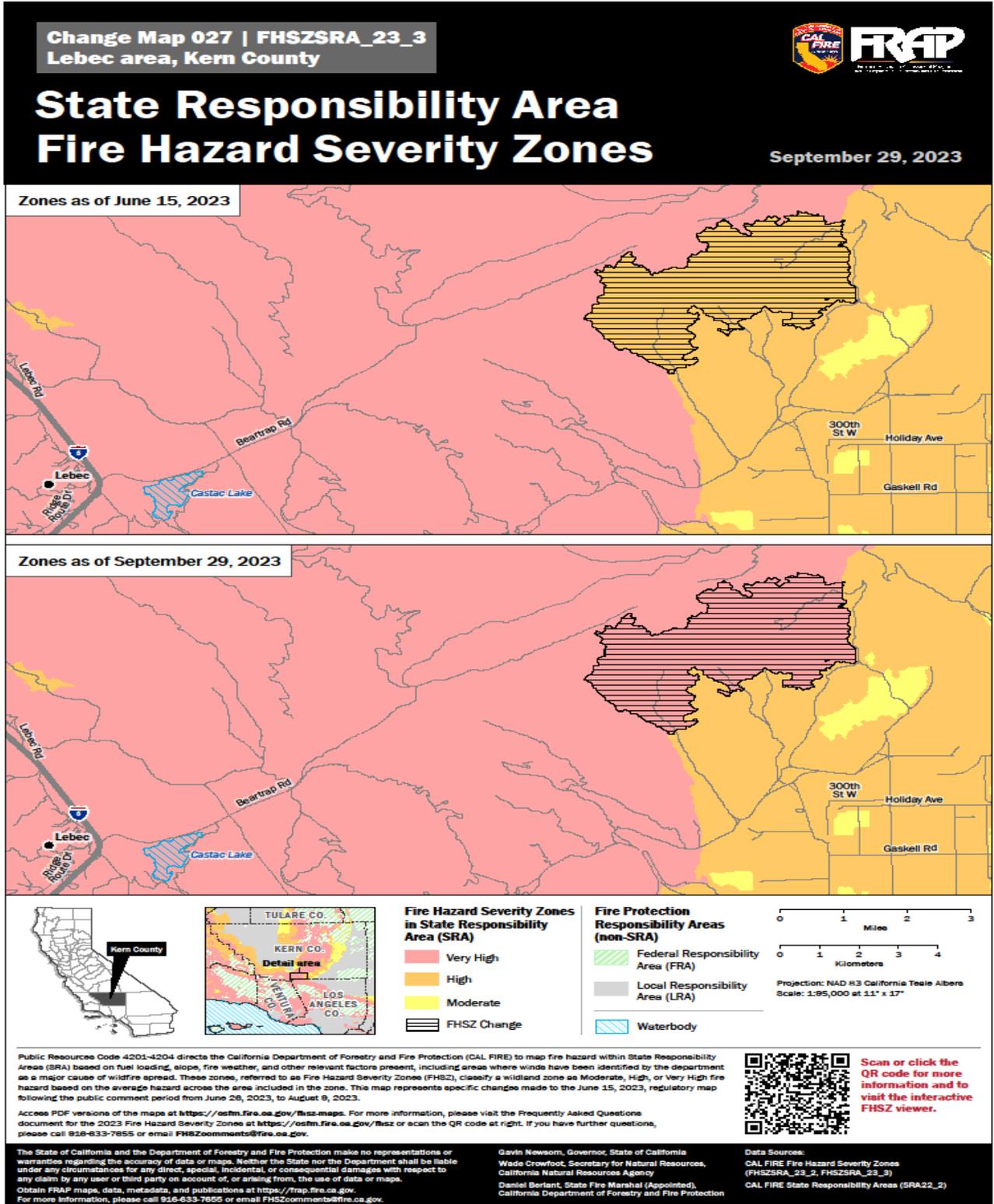
Change Map 025 | FHSZSRA_23_3, San Luis Obispo Coast, San Luis Obispo County



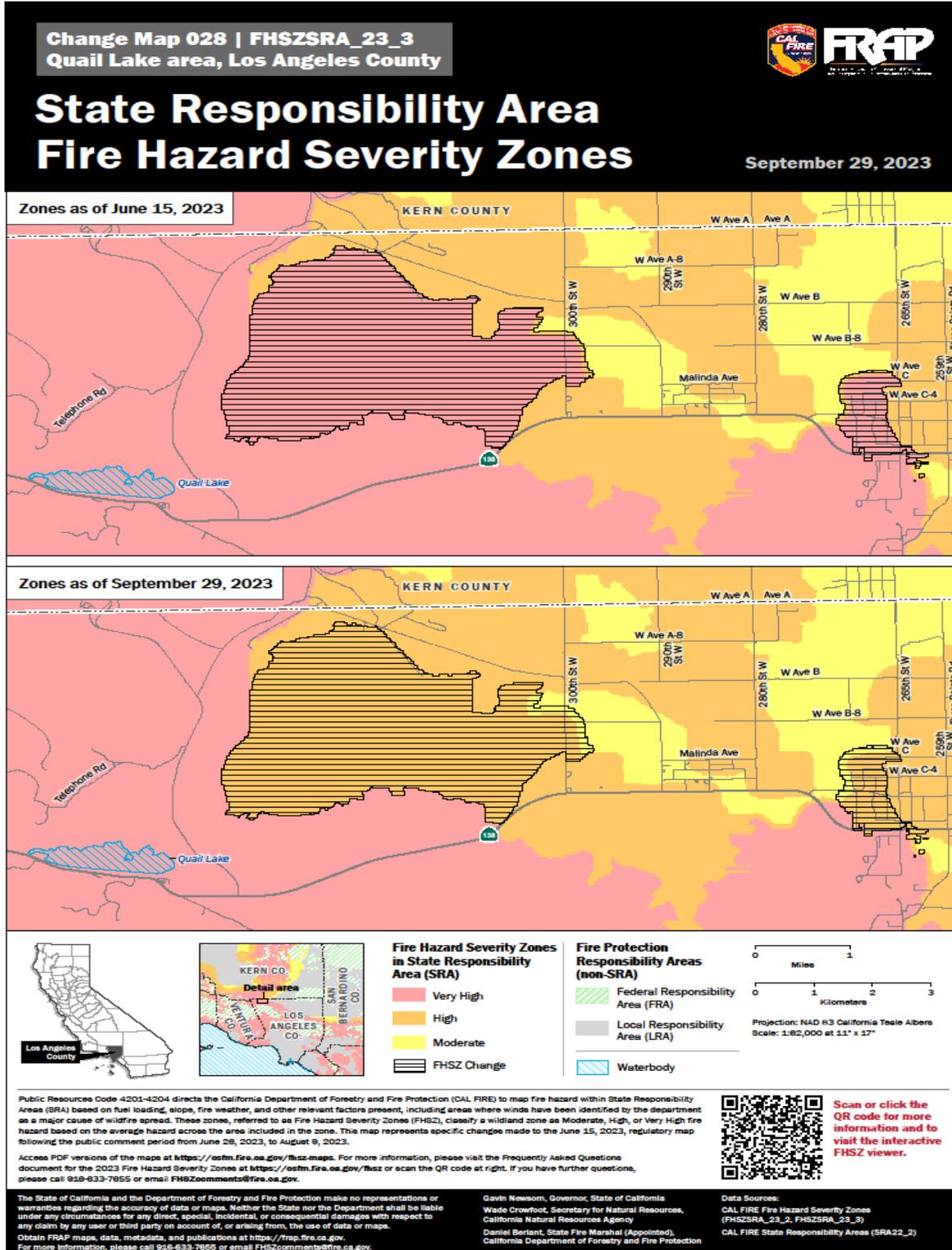
Change Map 026 | FHSZSRA_23_3, Avila Beach area, San Luis Obispo County



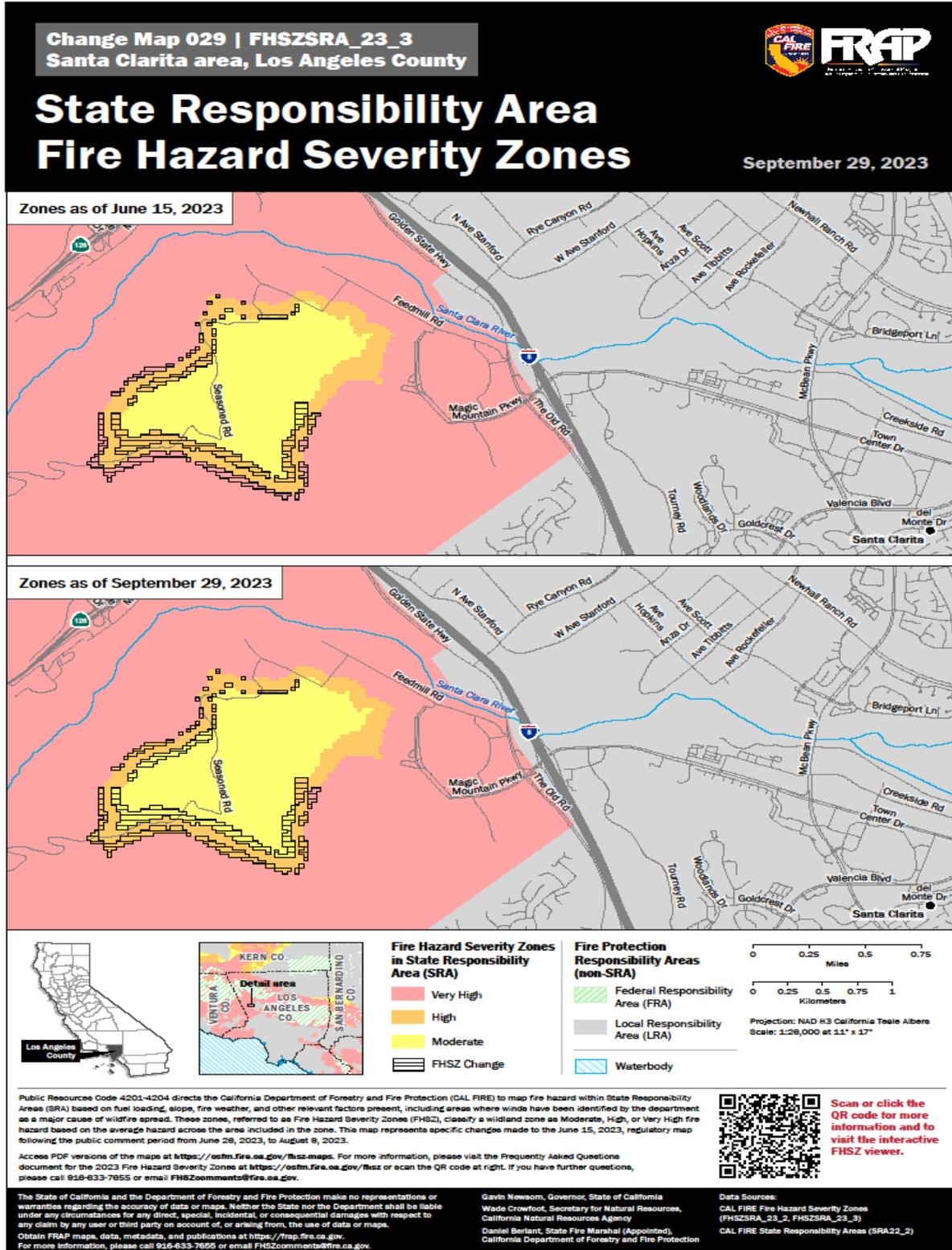
Change Map 027 | FHSZSRA_23_3, Lebec area, Kern County



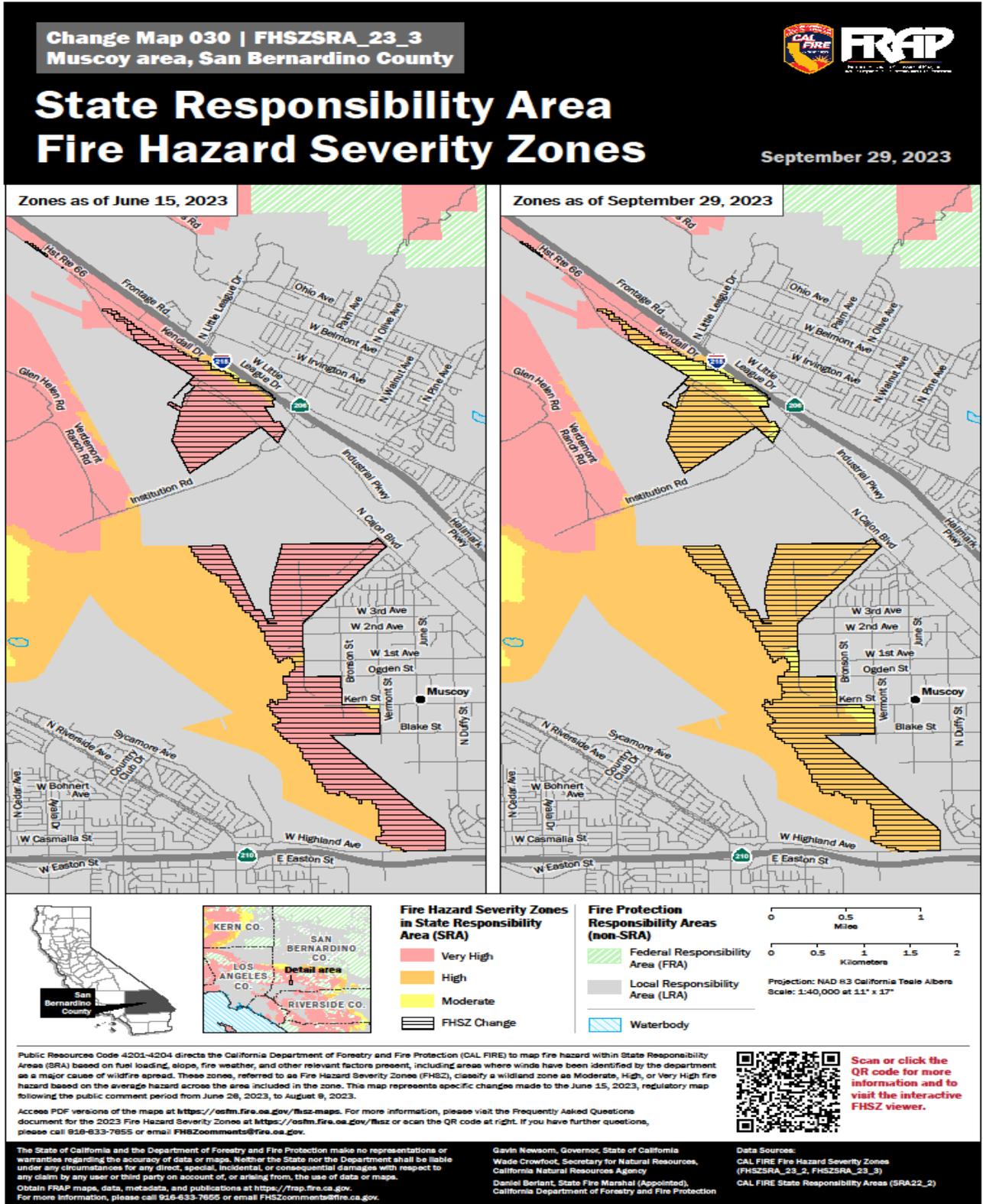
Change Map 028 | FHSZSRA_23_3, Quail Lake area, Los Angeles County



Change Map 029 | FHSZSRA_23_3, Santa Clarita area, Los Angeles County



Change Map 030 | FHSZSRA_23_3, Muscoy area, San Bernardino County



Change Map 031 | FHSZSRA_23_3, Rancho Mission Viejo area, Orange County

