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Date: October 15, 2021 at 9:22:31 AM PDT

To: Hector Estrada <hector.estrada@sccfd.org>

Subject: Appeal of CAL Fire Exception Denial for PLN15-10815-MOD1-APL1

Chief Estrada –

Please accept the following as our documentation outlining the effects of the requested exception on wildfire protection, as required by 14 CCR 1270.06 (d).

Studies have shown that urbanization has a pronounced effect on fire activity: fire activity continues to increase, the majority of fires are burning closer to developed areas, and fire activity peaks in areas where urbanization has occurred. Wildfire is a significant threat to human and natural resources.

In 2003, California wildfires destroyed more than 730,000 acres, 3,600 residential structures, and resulted in the loss of 25 lives. In 2017, wildfires burned over 1.3 million acres, and at the time, five of those fires were listed among the twenty most destructive in State history. The 2017 wildfires killed 41 civilians and 2 firefighters and destroyed or damaged over 10,000 structures. The Thomas Fire, in December, burned over 280,000 acres and, at the time, was the largest wildfire in California history.

2017 was quickly eclipsed by even greater destruction and casualties in 2018 and 2020. The Camp Fire, in Butte County, destroyed nearly 19,000 structures, including most of the town of Paradise, and killed 85 civilians. Six fires from 2018 and 2020 have eclipsed the Thomas Fire in size, and nine fires from 2018 and 2020 have been listed among the 20 most destructive wildfires in State history. These back-to-back-to-back record-breaking fire seasons are unprecedented in California; previous records for the largest, deadliest, and most destructive wildfires had stood for decades, some for generations.

Narrow and overgrown roads leading into and out of communities that lie in the wildland urban interface setting are jeopardizing the safety and lives of not only firefighters but the residents who live in these communities. These narrow roads do not and will not allow for the simultaneous use by evacuating citizens and responding fire department equipment. The 2006 Esperanza Fire claimed the lives of five firefighters, and the final report lists roads as a contributing factor that led to the deaths of the firefighters. In 2015, poor road networks led to deaths in the Valley Fire. Of the 85 people killed in the Camp Fire (2018), seven of them were found in their cars.

It is within this increasingly dangerous and expensive context that the State Minimum Fire Safe Regulations establish fire safety standards for development in areas at risk of wildfire. The Appellant has failed to offer alternative means and methods that would provide the same practical effect as adequate access and egress during a wildfire. Adding additional housing stock to existing nonconforming road networks without mitigating the hazards associated with inadequate access and egress increases the risk for residents, visitors, and emergency responders, alike.

Dwight Good

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