



ARCCA

Alliance of Regional Collaboratives
for Climate Adaptation

December 18, 2020

Erik de Kok
1400 10th Street
Sacramento, CA 95814

RE: Fire Hazard Planning Technical Advisory: General Plan Technical Advice Series, 2020 Update: Public Review Draft

Dear Mr. Erik de Kok,

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) welcomes the opportunity to provide comments in response to the Fire Hazard Planning Technical Advisory: General Plan Technical Advice Series, Public Review Draft.

ARCCA is a California-based network of regional climate collaboratives – each encompassing a diverse, multisector network of agencies and organizations working together to accelerate climate adaptation throughout their region and to catalyze on-the-ground resiliency-building initiatives. As a statewide network, ARCCA brings together thought leaders and practitioners to advocate for equitable and effective adaptation principles and policies, to collaborate towards innovative and holistic solutions, and to build a culture of prioritizing climate and community resilience. Our member collaboratives represent the following regions: North Coast, Sierra Nevada, Greater Sacramento Area, San Francisco Bay Area, Central Coast, Los Angeles County, and San Diego County.

We offer a few additional comments to support the finalization of the TA Advisory, which align with [ARCCA's Guiding Principles](#) for effective and equitable adaptation to mitigate, prepare for, and recover from the impacts of climate change. Our comments are intended to provide high-level recommendations and reflect the diversity of California's regions and their priorities. While our network includes over 250 individual public agencies, organizations, businesses, and academic institutions from across California, the comments provided in this letter are not necessarily endorsed by each of our individual members.

First, we would like to thank you and your team, as well as the other collaborating agencies, that made the Fire Hazard Planning Technical Advisory Series possible. The General Plan Advice enclosed in the public review draft is comprehensive, integrated with multiple other state efforts, and reflects an inclusive and holistic approach to enhancing wildfire resilience and mitigation. Thank you for all of your



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work, and for addressing a very prescient issue. We have very limited comments for improvement, and we have included some notes below to consider as you finalize the Series.

Affordable Housing and Wildfire Nexus (pg. 7-9)

The technical advice covers a considerable amount of ground pertaining to the issue of homes in the wildland urban interface (WUI) and their vulnerability, and how competing pressures of housing needs and increasing fire property insurance prices both compromise community resilience and housing affordability. State funding programs, like the Affordable Housing and Sustainable Communities program, would be well served to continue to incentivize densifying urban centers in communities with high percentages of housing in the WUI. The guidelines draft also references rising insurance costs as decreasing housing affordability, an ongoing and growing challenge that communities face. The State should continue to acquire data in a systematic fashion in order to better define and quantify the problem, and propose appropriate policy solutions in light of the impending market failure – a policy priority that we urge the administration and legislature to consider moving into 2021.

Co-Benefits of Forest Health (pg. 12)

The inclusion of co-benefits of carbon sequestration, biodiversity, healthy watersheds, and stable rural economies is a welcome one in these guidelines. We encourage the Office of Planning and Research to continue to champion the inclusion of these co-benefits in funding programs through multiple state agencies, such as the California’s Natural Resources Agency, Department of Forestry and Fire Protection, Office of Emergency Services, Department of Housing and Community Development, Public Utilities Commission, and the Department of Insurance. State agencies are also encouraged to follow the work of the Eastern Sierra Sustainable Recreation Partnership and their current project that seeks to quantify the economic value of forests and their economic engines of wood products and recreation. The economic valuation of ecosystems services would be particularly powerful for forested regions throughout the state and could serve as a tool to capture the costs of externalities posed by climate change and encourage deeper collaboration across the urban-rural transect.

Updated Environmental Checklist (pg. 24)

With the addition of wildfire safety considerations to the CEQA process, we anticipate that new projects will undergo even more rigorous vetting. As the state considers slope in wildfire hazard mitigation, it would be helpful if programs funding affordable housing also considered slope limitations as part of their urban infill definitions. Currently, there are no considerations in the codified definition of an urban infill project that allow for the 75% developed perimeter to include steep slopes as part of that perimeter. Such an alignment of affordable housing challenges and public safety considerations would greatly enhance the ability of communities to continue developing affordable housing while adhering to state safety guidelines.



Thank you for the opportunity to review the public draft and provide comments. We again want to emphasize our overall support for the Fire Hazard Planning Technical Advisory: General Plan Technical Advice Series and its robustness in addressing a number of challenges that California communities are facing due to the increasing frequency and severity of wildfires. Please do not hesitate to reach out to Julia Kim at jkim@lgc.org or 916-448-1198 x304 if you have any questions.

Sincerely,

Phil Gibbons, ARCCA 2020 Chair

San Diego Regional Climate Collaborative

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