



January 12, 2023

Daniel Berlant
Acting State Fire Marshal / Deputy Director
California Department of Forestry and Fire Protection
715 P Street
Sacramento, CA 95814

SUBJECT: Fire Hazard Severity Zones Public Comment Period

Dear Director Berlant:

The California Chamber of Commerce, California Building Industry Association and the other undersigned organizations thank you for the opportunity to provide comments on the draft Fire Hazard Severity Zones (FHSZ) map for the State Responsibility Areas (SRA) advanced by the Department of Forestry and Fire Protection (CAL FIRE) and the Office of the State Fire Marshal. We agree with CAL FIRE that high-level wildfire hazard mapping is a valuable tool for all Californians. However, we write to express our collective concern about the unreasonably short 45-day public comment period and the need for the agency to provide more time and release its methodology in determining the significant mapping changes affecting almost 31 million acres of California and millions of California residents.

CAL FIRE spent the better half of a decade internally developing a new model to update the FHSZ mapping that culminated in significant changes to the Very High, High, and Moderate Fire Hazard Severity designations throughout California. [According to CAL FIRE](#), the modeling used to create the hazard zones differs from the prior model requiring years of refinement and peer review. It is our understanding that model inaccuracies forced CAL FIRE to miss its own adoption process timeline that had originally provided for public hearings to occur during the Fall of 2022¹. The modeling methodology, key data sets, and driving assumptions have not been made publicly available.

The public and stakeholders all impacted by the updated map are being provided a mere 45-days to review and comment without all of the relevant underlying methodologies employed by the agency. CalChamber and the other undersigned organizations have hundreds, and in some cases thousands, of members to inform over the holidays and new year about the updated map that will have significant consequences for millions of California residents. The FHSZ designations determine, among other things, planning decisions, building code applications and availability and cost of residential home insurance. This process takes time to ensure all stakeholders are made aware of the process, and then additional time to review and provide comments either through their respective associations or directly to the agency.

Having only released the updated SRA map to the public on Wednesday, December 14, 2022, just a week prior to major holidays, CAL FIRE [initiated a speed round series of county-specific hearings](#) soliciting feedback. Notably, the first of these hearings² designed to solicit oral and written comment were noticed and held less than 48 hours following the release of the SRA map. Additional public hearings were convened in counties³ highly vested in wildfire safety during the December holiday season⁴ when Californians are traveling or unavailable to participate. Numerous individuals and organizations were not able to attend. Other hearings currently noticed to occur throughout the month of January take place on a Saturday over the Martin Luther King, Jr. Holiday, including in the state's most populated county,⁵ and on the actual federal and state holiday at night in Trinity County, home to several of California's most significant and historic wildfire activity. These selected hearing dates will inevitably deter public participation.

¹ May 17, 2022, Presentation to the Wildfire Mitigation Advisory Committee

² El Dorado County, December 16, 2022

³ Fresno County, December 20, 2022; Mono County, December 20, 2022; San Luis Obispo County, December 20, 2022; Tuolumne County, December 20, 2022; and Kings County, December 21, 2022

⁴ Hanukah (December 18-26) and Christmas (December 25)

⁵ Los Angeles County, January 14, 2023; and Trinity County, January 16, 2023.

Additionally, numerous stakeholders have ongoing projects throughout California with a long history with relevant fire data from decades of being directly on the ground in these territories. These existing projects have studies and CEQA documents sometimes ranging in the tens of thousands of pages with relevant and meaningful data pertaining to wildfires. Without adequate time for stakeholders to review not only the updated map, but existing studies for projects throughout California, the aggressive timeline will force stakeholders to effectively “data dump” enormous amounts of information onto the agency. Additional time provided to stakeholders will allow for a thorough review of the tens of thousands of pages of data per project so that stakeholders can provide only the data relevant to the mapping process to the agency.

After a decade of internal agency work updating FHSZ designations, we respect CAL FIRE’s determination to release an updated wildfire map. But we caution that rushing the public disclosure and comment period by giving Californians 45 days to evaluate the new map 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. As CAL FIRE has stated, the 2007 FHSZ map remains in effect until an updated map is adopted through regulation. Additional time will allow the public and stakeholders to better inform the regulatory outcome that CAL FIRE and the public hopes to achieve.

We ask 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. Alternatively with respect to the extension, CAL FIRE could choose to temporarily pause the SRA public comment period and conduct it simultaneously with the Local Responsibility Area (LRA) mapping process this Spring. The LRA map complements the SRA process and involve many of the same stakeholders who are vested in the outcomes of these processes.

Respectfully,



Adam J Regele
California Chamber of Commerce

On behalf of the following organizations:

American Council of Engineering Companies, California, Tyler Munzing
Antelope Valley Chambers of Commerce, Vicky Ventura
Bay Area Council, Luis Mirante
Brea Chamber of Commerce, Lacy Schoen
Building Industry Coalition of Southern California, Jeff Montejano
California Apartment Association, Debra Carlton
California Association of Winegrape Growers (CAWG), Michael Miiller
California Association of Realtors, Jennifer C. Svec-Williams
California Building Industry Association, Nick Cammarota
California Business Properties Association (CBPA), Matthew Hargrove
California League of Cities, Elisa Arcidiacono
California Retailers Association, Ryan Allain
California State Association of Counties (CSAC), Catherine Freeman
Carlsbad Chamber of Commerce, Bret Schanzenbach
Chino Valley Chamber of Commerce, Zeb Welborn
Corona Chamber of Commerce, Anthony Maldonado
Gilroy Chamber of Commerce, Victoria Valencia
Glendora Chamber of Commerce, Joe Cina
Greater Bakersfield Chamber of Commerce, Nichoas Ortiz

Greater Conejo Valley Chamber of Commerce, Danielle Borja
Greater Irvine Chamber, Bryan Starr
Greater Stockton Chamber of Commerce, Timm Quinn
Half Moon Bay Coastsides Commission, Krystlyn Giedt
Hueneme Chamber of Commerce, Tracy Phillips
Industrial Environmental Association, Jack Monger
Lake Elsinore Valley Chamber of Commerce, Kim Joseph Cousins
Los Angeles Area Chamber of Commerce, Esthela Pacheco
Los Angeles County Business Federation, Chris Wilson
Moorpark Chamber of Commerce, Chris Barrett
Murrieta Wildomar Chamber of Commerce, David Dry
North State Building Industry Association, Michael Strech
Orange County Business Council, Jennifer Bullard
Oceanside Chamber of Commerce, Scott Ashton
Rural County Representatives of California, Staci Heaton
Sacramento Metropolitan Chamber of Commerce, Jack Blattner
Santa Barbara South Coast Chamber of Commerce, Kristen Miller
Santa Clarita Valley Chamber of Commerce, Ivan Volschenk
Santa Maria Valley Chamber, Glenn Morris
Santa Paula Chamber of Commerce, John Marquez
Simi Valley Chamber of Commerce, Kathi Van Etten
Southern California Leadership Council, Mike Roos
Tri-County Chamber Alliance, David Dry
Tulare Chamber of Commerce, Donnette Silva Carter
Ventura County Coalition of Labor Agriculture and Business, Louise Lampara
Ventura County Taxpayers Association, Ron Golden
Vista Chamber of Commerce, Rachel Beld
West Ventura County Business Alliance, Nancy Lindholm
Western Electrical Contractors Association (WECA), Richard Markuson
Western Growers Association, Gail Delihant
Wine Institute, Noelle Cremers
Yorba Linda Chamber of Commerce, Alex Hernandez

cc: Office of the State Fire Marshal
Secretary Wade Crowfoot
Governor Gavin Newsom