



RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

July 23, 2020

The Honorable Henry Stern
Member, California State Senate
State Capitol, Room 5080
Sacramento, CA 95814

**RE: Senate Bill 1348 – OPPOSE
As Proposed To Be Amended July 27, 2020**

Dear Senator Stern:

On behalf of the Rural County Representatives of California (RCRC), I am writing to regretfully express our opposition to your Senate Bill 1348, as proposed to be amended July 27, 2020, relating to defensible space, vegetation management, and fire hazard severity zones. RCRC is an association of thirty-seven rural California counties, and the RCRC Board of Directors is comprised of elected supervisors from those member counties.

RCRC member counties contain more than 70 percent of the state's forested lands, including the vast majority of both the State Responsibility Area and National Forest System lands. RCRC has also been a tireless advocate for California's forest management and fuels treatment reduction strategies and was a strong supporter of the California Board of Forestry and Fire Protection's (BOF) efforts to develop and adopt the Vegetation Treatment Program Environmental Impact Report (VTP EIR). The VTP EIR is key to allowing the state to move forward with vital vegetation treatment and fuels management projects to prevent future catastrophic wildfire events across the state. RCRC's counties also shoulder responsibility for fire response and in local responsibility area (LRA) lands and face important decisions regarding land use and development while maintaining community fire safety standards.

RCRC is strongly opposed to new language in SB 1348 regarding chaparral and coastal sage scrub plant communities, which we believe would require BOF to re-open the rulemaking for the VTP EIR. The VTP EIR is currently under litigation. Re-opening the rulemaking would push back important vegetation management projects and delay vital programs that would otherwise enable the state to catch up on essential forest health and wildfire prevention goals. While the problematic language in question is a mere few lines in Section 9 of the bill, the amendments could be disastrous to California's forest

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health goals in the long term by making the entire VTP EIR vulnerable after receiving strong support from a vast cross section of stakeholders.

RCRC also remains concerned with the language extending fire-safe construction requirements to the LRA and establishing defensible space requirements for unimproved parcels, which could have significant impacts to land use planning and development.

For the above reasons, RCRC must regretfully oppose SB 1348. If you should have any questions, please do not hesitate to contact me at sheaton@rcrcnet.org or (916) 447-4806.

Sincerely,

A handwritten signature in black ink, appearing to read "Staci Heaton", written over a light blue horizontal line.

STACI HEATON
Senior Regulatory Affairs Advocate

cc: Members of the Assembly Natural Resources Committee
Consultant, Assembly Natural Resources Committee
Consultant, Assembly Republican Caucus
J. Keith Gilliss, Chair, California Board of Forestry and Fire Protection
Matt Dias, Executive Officer, California Board of Forestry and Fire Protection