



April 15, 2019

Commission on Catastrophic Wildfire Cost and Recovery  
c/o Office of Planning and Research  
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Sacramento, CA 95814

Submitted Via Email to: [wildfirecommission@opr.ca.gov](mailto:wildfirecommission@opr.ca.gov)

**Re: Comments on topics for April 29 meeting**

Dear Commissioners:

Thank you for soliciting comments on the questions you will be considering at your meeting on April 29. We appreciate that, with release of Gov. Newsom's Strike Force Report, your duties include evaluating three key concepts regarding wildfire liability.

We are reviewing the proposed concepts and their potential impacts for the environment and are not yet ready to comment on those concepts or most of the questions contained in your request for comment for the April meeting. However, we would like to reserve the opportunity to share our thoughts on those concepts in the future.

We are prepared to respond here to one question asked in the solicitation for comments: "Do you have recommendations for ways to reduce wildfire damage and costs that the Commission should consider?" Please see Sierra Club California's thoughts below.

Reducing Wildfire Damage and Costs

There are three key actions or approaches we believe can help reduce fire impacts, including property damage and costs.

*1. Better coordinate and support defensible space and basic home hardening for low-income residents.* The current thinking about how to cut wildfire damage is increasingly converging around the notion that modern fire protection begins at the structure itself to about 100 feet outward. Creating a smart, but limited area of defensible space (100 feet from the building) and hardening the home as required by modern building codes are keys to fire resilience.

A recent analysis of the Camp Fire by reporters for McClatchy newspapers<sup>1</sup> noted that:

"...about 51 percent of the 350 single-family homes built after 2008 in the path of the Camp Fire were undamaged, according to McClatchy's analysis of Cal Fire data and Butte County property records. By

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<sup>1</sup> <https://www.sacbee.com/news/state/california/fires/article227665284.html>

contrast, only 18 percent of the 12,100 homes built prior to 2008 escaped damage. Those figures don't include mobile homes, which burned in nearly equal measure regardless of age.”

Despite the certainty that other fires had demonstrated that home hardening and defensible space work, too many homes in Paradise and other communities ravaged by fire in the last few years were not positioned to survive. One reason for this is lack of information. Another is lack of funds.

In Paradise, more than 25 percent of the population was over 65, and many of those were disabled. Additionally, regardless of age, the community's demographics show a high level of poverty or limited income. In that respect, Paradise is very much like many high-risk rural communities around the state—the population is older and poorer. The opportunities for residents to do basic defensible space or minimal home hardening—such as replacing old attic vents with ember-resistant vents—are limited by income and infirmity.

There are some laws passed in the last three years that will help create and advertise uniform defensible space measures. Others help provide some incentives for home hardening. But there doesn't appear to be an organized approach that a.) identifies low-income property owners in high-risk areas; b.) identifies services to provide defensible space and basic home hardening; and then c.) contracts with service providers to do the work at a reasonable rate with public funding. **Establishing a program or method for achieving this a-to-c approach would help reduce fire risk and better ensure fire survival.**

2. *Reduce reactive vegetation removal by utilities and force more permanent safety improvements to the transmission grid.*

In response to fire damage linked to poor maintenance of equipment and vegetation around equipment, investor-owned utilities have embarked on massive vegetation removal projects. Pacific Gas & Electric, for instance, has filed plans for—and been pushed by the court to accelerate and complete—massive tree removal along the path of powerlines throughout California.

There is no doubt that a dry tree branch touching a live wire in a windstorm during a high-fire period can ignite a wildfire. We have seen that. However, is the act of essentially clearcutting 12-foot-wide swaths of land under thousands of miles of utility lines the most effective, efficient, long-lasting and environmentally sensitive way to achieve safety? We argue that that approach is not efficient or effective and may actually create greater fire hazards as it also does serious damage to ecosystems, habitat and watersheds.

Specifically, miles of clear cuts are pathways for small forbs and grasses to sprout, which ultimately dry and become more hazardous than the vegetation that was removed. Indeed, the effect of the PG&E clearcutting is like laying tinder for future fires to sweep through.

**It would be smarter and have a longer lasting effect to establish a specific regimen of inspection and maintenance that utilities must take that doesn't result in the extraordinary and harmful clearcutting and vegetation clearing that we are seeing.** The regimen should be hierarchical and begin with removing or replacing the dangerous elements of the transmission system: the uninsulated power lines and aging transformers. This would be accompanied by trimming tall vegetation to a clearance space that would last for three years, and then requiring that utility companies inspect and, if needed, repair, replace and maintain equipment and vegetation on a regular inspection schedule of no less than three years.

3. *Recognize that wild fires are different under climate change and that fire suppression approaches must change to account for that.*

The new normal is a longer fire season. It is also a world with unusually hot weather earlier and later in the year, and strong, hard winds statewide that were formerly reserved for certain seasons in certain regions. In other words, wind-driven fires that defy experience and firebreaks are becoming more common.

Most destructive wind-driven fires are essentially ember storms. As fire scientists have learned, different types of trees cast embers different distances. Generally, a pine tree throws embers a couple of miles, and slightly farther in high winds. A eucalyptus ember can travel more than 15 miles. Given this, it makes sense for firefighters to get on top of a eucalyptus fire fast when it's within 15 miles of a populated area (which is where most eucalyptus is located in this state). But it makes less sense for firefighters to risk their lives to suppress a fire in a mixed conifer forest located a dozen miles or more from population centers. And when it comes to certain native shrub communities, the vegetation can act as an ember catcher that guards against fires reaching homes 200 feet away.

Particular disturbing is that as the legislature has reacted to increased fire risk, they have passed legislation that allows larger, more fire-resistant trees to be removed without ecological or fire management oversight.

Backing against the new reality of nearly year-round fire is a history of more than 100 years of routine fire suppression in California's forests.

All of this suggests that four things are needed. First, prescribed fire in forests located far from populations centers must be employed to help restore the state's wildlands and ecosystems and make them more fire resistant. Second, fire suppression must be scaled back when possible to take advantage of the restorative ecological value of wildfire in unpopulated areas. Third, the drive to remove big, fire-resistant trees without oversight needs to be ended. Fourth, the focus for wildfire management must be moved closer to communities and homes.

Emergency preparedness, including ensuring escape routes, creating and maintaining defensible space within 100 feet of homes and structures, requiring hardening of homes and structures, and preserving the most fire-resistant vegetation, must become the focus of wildfire management. **This will require a rethinking of how CalFire—an agency historically involved in wildfire suppression in remote areas—should be organized and how its practices should and could be driven closer to communities.**

Thank you, again, for the opportunity to comment before the April 29 meeting. We look forward to continuing to share our thoughts as your deliberation progresses.

Sincerely,



Kathryn Phillips  
Director