Date

Name

Address

CSZ

Dear \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_:

We’re encouraged by California’s unprecedented emergency funding to address California’s wildfire challenges, and thank you for your ongoing consideration of Gov. Newsom’s fiscal year 2021-22 budget proposal for wildfire mitigation. We appreciate the Administration’s and Legislature’s efforts to address the serious risk of wildfire and need to better protect our forests and other landscapes. However, we believe that the current proposals should be improved to provide better protections for wildlife, lands and people. California must correct its modern legacy of harmful logging practices, fire suppression in forests, habitat destruction, and overgrazing. By improving ecological forest management and conservation and focusing funding on hardening communities, we can save lives and property while enhancing our state’s rich native biodiversity, and protecting our watersheds.

**We urge the Legislature to modify this proposal to ensure that appropriate levels of funding are directed into the right locations to protect communities and ecosystems and that science-based solutions are used appropriately in California’s different regions.**

California’s plants evolved in concert with natural fire frequencies, and those frequencies – the fire return intervals – are out of balance in some ecosystems. The fire return interval is too long in many conifer forests of the Sierra Nevada and North Coast ranges and too short in many of the shrublands of coastal Central and Southern California. In general, we have too little fire in the Sierra Nevada and too much fire along our central coasts and southern coasts and interior.

To restore balance, we must improve how we manage our forests with a priority placed on managed wildfire when possible and the use of prescribed fire when appropriate to enhance our state’s rich native biodiversity and protect our watersheds. We also must continue to invest in permanent conservation of forest ecosystems, in which we are working to recreate more natural structure, including bigger, older, and more fire-resistant trees.

In many shrubland habitats, wildfire is too frequent, and the solutions must be different. Frequent fires can type convert shrublands, through which recurring fires kill certain shrub species before they can reproduce. Chaparral and shrubland habitats are then replaced with quick-drying, non-native, invasive, annual plants. This exacerbates the cycle of too-frequent fires, as the resulting system is more easily ignited and will burn over and over again.

*California’s Wildfire and Forest Resilience Action Plan* explains that “California’s diverse landscapes and communities require regionally tailored strategies and actions. Protecting California’s communities and natural places from the impacts of catastrophic wildfire cannot be achieved through a ‘one size fits all’ solution.” Wildfire related budget appropriations should reflect this tailored approach.

To get the right solutions in the right place, we recommend the following:

**1. Direct CAL FIRE to use funds for actions in chaparral and shrubland habitats, especially those in Southern and coastal Central California, that *do not* result in type conversion of habitat** and that avoid old-growth chaparral (greater than 50 years old) to the greatest extent possible to protect biodiversity.

Research shows that vegetation management practices like mastication, burning, and thinning in Southern and coastal Central California habitats cause type conversion, ***increasing rather than decreasing fire risk***.

Funds for these habitats are better spent on:

* Education around defensible space and the critical 0-5’ ember resistant zone
* Ignition control along roadways
* Fire road maintenance to protect communities
* Defensible space of 100 feet around structures and/or communities
* Strategic fuel breaks within 1,000 feet of communities at risk (not in remote areas)
* Removal of flammable non-native, invasive species
* Restoration of native species in damaged or type-converted vegetation

Without more specific direction by the Legislature, we are deeply concerned that with an influx of new funding CAL FIRE will ramp up its common practices -- mastication, thinning, and burning -- in habitats, like southern California chaparral, where these management actions will cause serious ecological damage with little fire prevention benefit. For example, at the Assembly Natural Resources Committee hearing on November 9, 2020, CAL FIRE’s Chief Porter testified that burning in chaparral can be appropriate, and Board of Forestry Executive Officer, Matt Dias, testified that burning chaparral is acceptable as long as it does not cause type conversion. Research plainly shows that burning chaparral leads to type conversion (see Alexandra Syphard et al. 2018. Chaparral landscape conversion in Southern California). The National Park Service has abandoned prescribed fire in the Santa Monica Mountains, and California should be similarly cautious. In addition, old-growth chaparral (greater than 50-years-old) should be protected to the greatest extent possible to protect biodiversity.

Further, fuel breaks, especially those remote from development, are often harmful to chaparral habitats. Fuel breaks, as defined in the CAL FIRE Vegetation Treatment Program, include those sited in remote areas. Fuel break projects far from communities will do little to halt the spread of many of our state’s most destructive wildfires in the future, many of which will be wind-driven. A fire that can jump a 10-lane highway can easily jump a 200-foot fuel break. Many of these projects go against the best science, may increase fire danger, and will not affect the spread of wind-driven fires, which are responsible for some of the most catastrophic losses over the past decade.

**2. Increase the proposed Community Hardening allocation from $38 million to a total $150 million. Then, direct those resources toward the Office of Emergency Services to partner with local conservation districts and fire safe councils.**

A primary issue in shrubland communities is that people spark too many fires, particularly during high wind events, when no amount of clearing will stop the flames. Increased human presence in habitats is the strongest driver of ignitions and the subsequent loss of life and property. Even CAL FIRE acknowledges in its Vegetation Treatment Program that its proposed work will not stop or mitigate the destruction from the wind-driven megafires. In contrast, an OES partnership with local resource conservation districts and fire safe councils focused on community hardening, ignition reduction, and emergency preparedness will save lives. Therefore, more funding must be targeted toward these helpful, life-saving efforts and not toward the broad-scale destruction of shrublands that will only serve to exacerbate the problem.

**3. Increase funding of forest and habitat conservation at the Wildlife Conservation Board.**

The permanent conservation of forest ecosystems supports a more natural forest structure, including bigger, older, and more fire-resistant trees; meanwhile, conservation throughout the state – and especially in wind-driven fire locations – can prevent new homes and structures from being built in harm’s way and promote more climate resilient ecosystems.

California is taking important steps this year to correct the long-standing funding gap between fire-fighting and wildfire risk reduction. The Governor’s proposal provides important funding to address the current fire risk facing our state, but it requires further changes to ensure that we use these funds to ensure that communities, fish and wildlife, and ecosystems will be protected and thrive.

Thank you for your consideration.