**San Luis Obispo County Farm Bureau**

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April 4, 2023

Office of the State Fire Marshal

California Department of Forestry and Fire Protection

P.O. Box 944246

Sacramento, CA 94244-2460

Attn: Scott Witt, Deputy Chief

By email to: fhszcomments@fire.ca.gov

**Re: Public Comment on Proposed Rulemaking concerning the Regulations Relating to Fire Hazard Severity Zones in the State Responsibility Area. (California Regulatory Notice Register 2022, No. 50-Z, December 16, 2022, p. 1490)**

On behalf of San Luis Obispo County Farm Bureau, I am writing to oppose the proposed changes to the Fire Hazard Severity Zones (FHSZ) in the State Responsibility Area. A substantial number of our members reside in rural areas, and the proposed changes to FHSZ would be detrimental to our farmers and ranchers’ ability to acquire property insurance. Additionally, we are concerned the changes would exacerbate our shortage of housing across San Luis Obispo County, as homebuilders will have to comply with costly, new requirements.

One of our local municipal fire chiefs extensively reviewed the FHSZ changes. Some of the problems identified were as follows:

* CAL FIRE determines “Hazard” based on expected fire behavior over 30-50 years; however, fire maps dating back to 1878 show no fires in this area. Nonetheless, CAL FIRE is proposing to increase the severity level from High to Very High. No homes or outbuildings have been destroyed by wildfire in this timeframe.
* It is also of concern that no mitigation measures were considered when the models were run. The San Luis Obispo area is predominately a wine region. The area in question is filled with vineyards, almond groves, dry land farming, and sparse fuels. Additionally, the local weather is not conducive to the propagation of fire.
* In reviewing other proposed changes, errors were also found. One of those areas had one of the most destructive fires in history, yet their low rating stayed the same with the new proposed maps. Another area had the rating elevated, despite the fact it is a sandy beach with no natural fuel sources.

We ask the Office of the State Fire Marshal to address these concerns prior to adopting any FHSZ changes for San Luis Obispo County.

Sincerely,

 

Brent Burchett, Executive Director

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