



March 11, 2021

California State Legislature
Sacramento, CA

Re: The Proposed Wildfire Budget – Lives and homes first

Dear Honorable Members of the California State Legislature,

The Newsom administration's new budget proposal to address wildfire risk has, for the first time, allocated funds to support proven strategies that will save lives and protect homes – focusing directly within and around communities at risk to make them fire safe.

This is a hopeful beginning. However, **only 5% of the proposed \$1 billion budget will be available to communities to protect themselves from wildfire.** The rest, \$922 million, is being allocated for plans to fund the clearance of a half million acres of habitat per year including the logging of forests far from most communities at risk – an approach that has consistently failed to protect our neighborhoods from wildfire and will cause significant damage to the natural environments we treasure.

Primary Goal: Make saving lives and homes the top priority.

Key Metric: Nine out of the 16,909 fires in California during 2017 and 2018 caused 95% of the damage. All nine fires occurred under extreme, wind-driven conditions where vegetation clearance projects proved ineffective. Nearly all the most devastating wildfires in California since the 1991 Oakland Hills Fire exhibit similar characteristics, and most had little to nothing to do with forests. A comprehensive fire management plan **must focus on wind-driven fires where most fatalities and home losses occur.** The current approach focuses on the fires and environments that pose the least risk to our communities.

1. Fund Proven Strategies

The scientific consensus is overwhelming concerning the most effective way to protect lives and communities from wildfire – **focus on making homes fire resistant**, reduce flammable materials within 100 feet around them, and prevent developers from placing neighborhoods in harm's way

(e.g., SB 55, introduced by Senators Stern and Allen, and AB 1295 introduced by Assembly Member Muratsuchi). This focus is critical because the most devastating fires in California are wind-driven, casting billions of hot embers miles ahead of the fire front. **It's the embers that destroy our communities like Santa Rosa, Paradise, Ventura, Oakland, Malibu, and San Diego, not the flames from burning forests or shrublands.**

Wildfire risk reduction funds need to be spent on proven strategies [\(1\)](#). **Anything less takes away opportunities to save more lives and homes.**

Recommendations: Require 50% of proposed funds be used with 100 feet of homes to help vulnerable communities (especially low-income) retrofit flammable structures, install fire suppression systems (e.g., exterior sprinklers), and create appropriate defensible space. Funds should also be made available to identify the most at-risk neighborhoods and standardize home wildfire safety inspections.

2. Fund Vegetation Management/Restoration Projects That Work

California has the greatest habitat diversity of any other state in the U.S. Therefore, vegetation management projects **must be developed on a regional basis** (e.g., AB 1255, introduced by Assembly Member Bloom) and based on the best available science.

To the detriment of fire safety, the pervasive false narrative, one that is reflected in the proposed budget, is that forest mismanagement and past fire suppression is responsible for our devastating wildfires. President Trump leveraged this false narrative when blaming California for not doing enough raking of the forest floor. This narrative is repeated so many times without question that logic has all but been abandoned. After the Woolsey Fire in Malibu, news stories suggested thinning forests and removing dead trees was the solution – Malibu, where the nearest forest is more than 30 miles away.

Contrary to conventional wisdom, **there is significant scientific disagreement** when it comes to the effectiveness of logging forests to reduce community fire risk and the size and severity of wildfires [\(2\)](#). The wildfire budget needs to reflect this instead of allocating more than 90% of the funds on questionable strategies.

Forests

California's forested landscapes have been severely damaged by past and current efforts to extract timber and other natural resources. The fire suppression narrative has diverted attention away from this history of damage by past logging, promoting additional logging and habitat clearance in an attempt to reduce fire risk. The effectiveness of such an approach is strongly challenged by hundreds of scientists [\(3\)](#).

The perspective that our forests are “clogged” with vegetation or “over-forested” due to more than a century of fire suppression is a serious misnomer. **At least 63% of California’s low- and mid-elevation conifer forests have either been logged or burned since 1950** (see maps, Figure 1).

There are **approximately 27 different types of tree-dominated ecosystems in the California**, 16 of which are traditional forest types with a substantial conifer component and a relatively tall overstory in maturity. From coastal redwood forests to subalpine forests, the diversity of these ecosystems and the tree species therein is vast and complex. Regardless, most forest types experience some form of mixed-severity fire regime, meaning that fires—even when large—burn with a variety of effects and leave behind mostly low or moderately burned forest interspersed with severely burned patches. Some forest types, such as closed cone pine-cypress ecosystems that are dominated by species such as knobcone pine or Sargent cypress, burn mostly at high severity and have done so for millennia.

Without recognizing the wide diversity of forests in California, one-size-fits-all solutions are often proposed, potentially causing significant ecological damage when implemented.

We must accept the fact that large, high-intensity fires are inevitable and are **primarily dependent on weather conditions (e.g., drought, low-humidity, wind), not the condition of the forests**. Attempting to make forests “resilient” to fire through logging, mastication, and herbicide spraying will only make matters worse by adding additional disturbance to already damaged ecosystems.

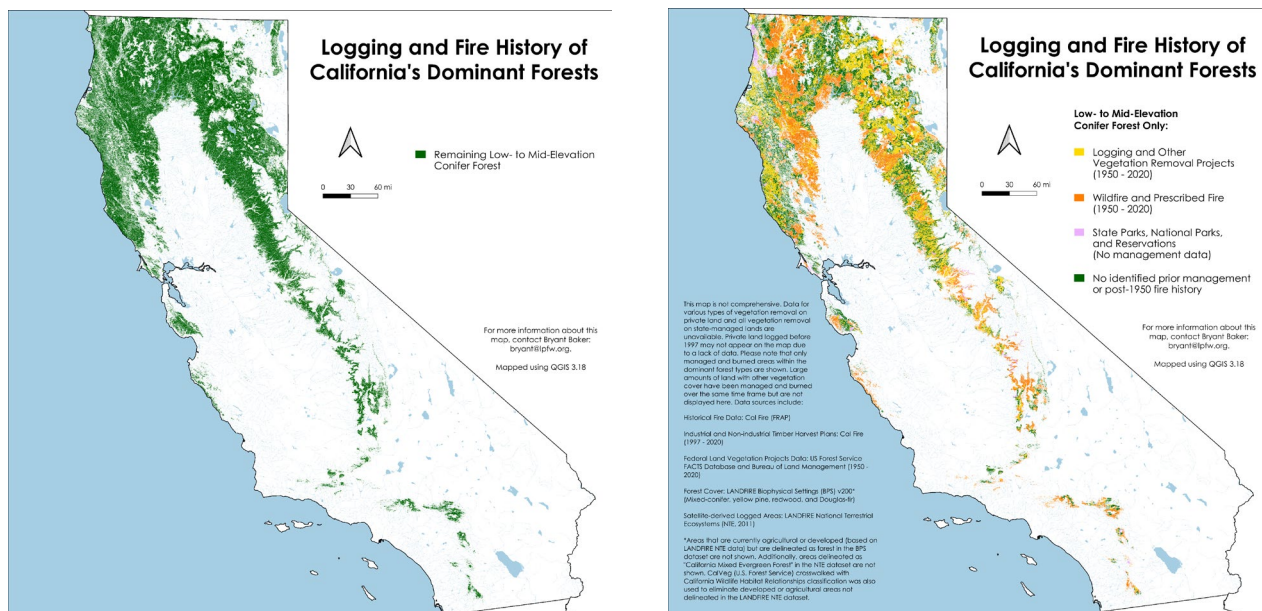


Figure 1. At least 63% of California’s low to mid-elevation conifer forests (green) have either been logged or burned since 1950 (colored overlay to the right). See larger versions at the end of this letter (Figures 1A and 1B).

Chaparral/Sage Scrub

Native shrublands, especially chaparral, represent California's most extensive ecosystems (Figure 4). These systems are **threatened by too much fire** [\(4\)](#). Both federal and state agencies have recognized this threat:

- California's Climate Change Vulnerability Assessment of the state's terrestrial vegetation predicts **chaparral will likely disappear** throughout much of southern California within the next century if current trends continue (Figure 2).
- The United States Forest Service established a new leadership intent to protect chaparral in California because human-caused fires have increased fire frequency to the extent that **chaparral can no longer survive** and is being replaced with non-native annual grasses at an alarming rate (USFS 2011).
- The California Board of Forestry's Vegetation Treatment Program (VTP) states that, "coastal sage scrub and chaparral, **are experiencing fires too frequently**, resulting in changes to their ecology."
- The California State Legislature amended the Public Resource Code (PRC 4483) to mandate additional consideration for chaparral and coastal sage scrub plant communities that **are being increasingly threatened by fire frequency**.

Chaparral provides critical ecosystem services, especially watershed protection, as well as habitat and intrinsic value. Therefore, to protect the chaparral that remains in California, **we must look forward and not repeat past mistakes**, and mitigate for increasing fire frequencies that climate change will likely cause.

In the past when rangeland management goals dominated the discussion, there were efforts to prescribe burn or eliminate older chaparral stands. It was also believed that such an approach would benefit fire management goals. However, research over the past two decades has rejected these older perspectives. As a consequence, **prescribed burning is no longer considered a reasonable approach to chaparral management**, especially in southern California [\(5\)](#).

Considering climate change causing warmer, drier environments (Figure 3) and increased fire frequencies, we need to **keep fire out of old-growth chaparral as much as possible**. In addition, the research has made it clear that when prescribed burns are typically conducted in the chaparral (during the late spring), chaparral can be damaged irreversibly, type-converting to weedy grasslands. Unlike native species, these weedy grasslands are highly flammable and ignite readily. This is why the chaparral-dominated Santa Monica Mountains National Recreation Area turned away from prescribed burning in 2005. Vegetation treatments, such as mechanical thinning, are similarly damaging and will cause type conversion (elimination/reduction of dominant shrub species, loss of canopy cover, and/or invasion of non-native weeds and grasses).

Recommendations: Require 25% of proposed funds be used to develop **regional vegetation management/restoration plans** that reflect the complex diversity of California's natural environment. Vegetation management for the purpose of fire risk reduction should focus thinning vegetation along evacuation routes, within 100 feet of structures, and removing flammable invasive species to reduce ignitions. Preventing roadside ignitions makes great sense, as this is exactly where many fires start.

Restoration projects should address the actual causes of forest degradation (past logging/overgrazing) and reverse/prevent chaparral type-conversion (elimination/reduction of dominant shrub species, loss of canopy cover, and/or invasion of non-native weeds and grasses).

For chaparral and coastal sage scrub, the focus needs to be on reducing fire frequencies, the removal of flammable, invasive weeds and grasses, and preventing the ignition of intact stands. **Special consideration needs to be given to protecting old-growth chaparral (>50 years)** as very little is left in the state. Post-fire chaparral and sage scrub should be left alone to allow it to respond naturally. Considering the threat these habitats face due to increased fire frequency, **prescribed burning and other vegetation treatments outside of defensible space should not be considered** as per the Santa Monica Mountain National Recreation Area [fire management plan](#).

For forests, *wildfire* should be allowed to help heal the damage caused by more than a century of logging abuse. Nature provides the best vehicle for post-fire forests to thrive (Figure 5). Therefore, felling or removal of dead trees and replanting after fires should not occur except within less than 100 to 300 feet of communities to remove hazard trees and restore local parks and recreational areas. The use of prescribed fire should be limited to forests that have missed at least two fire rotations, with prioritization given to natural fire use (allowing lightning fires to occur safely away from communities). Despite dramatic predictions, the presence of dead trees and bark beetles have not led to catastrophic wildfires [\(6\)](#). In fact, tree mortality and the native bark beetles that dying trees attract represent natural processes of forest thinning, providing more ecological benefit than chain saws and grinding machines.

Rewrite the current Board of Forestry's Vegetation Treatment Program (VTP) to create a new science-based plan reflecting the points offered in this document. As it currently stands, the VTP focuses exclusively on habitat clearance, fails to provide guidance to regional land managers regarding the prevention of type-conversion of shrublands, and fails to provide the type of state-wide guidance sorely needed to protect communities from burning [\(7\)](#).

3. Fund Regional Comprehensive Fire Plans

Considering the increasing rise in the loss of life and property due to wildfires in California, there needs to be a significant change in the fire management system. Doing more of the same is not logical nor is it preventing loss of life.

Recommendations:

Require 25% of proposed funds be used to support local fire departments and districts to upgrade equipment, solve chronic coordination/communication problems, improve warning systems, develop functional evacuation plans, and form a connected network of local fire, conservation, and resource entities to oversee and coordinate the expenditure of wildfire risk reduction funds.

In order to create innovation solutions, it is imperative that these recommendations be overseen by a government entity that is relatively **independent and separate from Cal Fire**. The Office of Emergency Services may provide such a vehicle, with regional entities playing major roles in the distribution of funds and the creation/administration of funded projects.

Establish an interdisciplinary, statewide Fire Preparedness Task Force (FPTF) versed in Catastrophic Risk Management (CRM) to evaluate our response to wildfire hazard. CRM is successful because it helps managers in high-risk organizations make better decisions by reducing their tendency to “normalize deviance,” engendering a focus on positive data about operations while ignoring contrary data or small signs of trouble. The nearly tacit expectation of loss of life and property during wildfires is a symptom of normalizing deviance. Airlines use CRM to objectively analyze plane crashes, thereby creating safer planes. Without CRM, small deviations from standard operating procedures are often tolerated until disasters, such as the Deepwater Horizon offshore oil platform blow out, the Challenger Space Shuttle explosion, or unprecedented losses caused by recent wildfires expose an organization’s failures. Ensure that a majority of task force members can speak freely, enabling them to offer creative solutions, and that half of the membership is outside the fire profession.

Due to the current wildfire budget proposal’s focus on logging forests and habitat clearance, it will do little to protect communities like Coffey Park that burned in the 2017 Tubbs Fire, will increase fire risk by spreading non-native weeds and grasses, and will further compromise already ecologically compromised ecosystems.

However, we are encouraged by the initial funding proposal of direct community wildfire protection and by the Newsom administration’s promise that a wildfire risk reduction strategy needs to be **“not either, but both”** in relation to vegetation management and protecting communities – **we look forward to a wildfire budget that reflects this promise.**

While large, high-severity fires are inevitable, the destruction of our communities by those fires is

not. Together we can develop a comprehensive fire management plan that successfully reduces fire risk in a manner that will protect our families and the natural environment.

Sincerely,

Richard W. Halsey
California Chaparral Institute

Pending Organizations sign-ons.

Pending Individual sign-ons.

The Science

References

1. The Science of Protection for Homes from Wildfire

<https://californiachaparral.org/fire/protecting-your-home/>

2. The Mischaracterization of California Wildfires

A letter to the Los Angeles Times, explaining why there must be more objective reporting about wildfires in California:

https://static-cdn.edit.site/users-files/a045ad78962cde3564de3160ef5708c3/mischaracterization-of-california-wildfires_letter-to-lat-editors.pdf?dl=1

3. Open Letter to Decision Makers Concerning Wildfires in the West

https://californiachaparral.org/_static/cfb51ddaff2f3391f01916e48654242e/scientist-letter-wildfire-signers-2018-08-27-1.pdf?dl=1

4. Chaparral is Threatened by Too Much Fire

<https://californiachaparral.org/threats/too-much-fire/>

5. Why Prescribed Fire is Not Appropriate for Native Shrubland Ecosystems

<https://californiachaparral.org/threats/prescribed-fire/>

6. Dead Trees Provide Critical Habitat – they do not pose the fire risk often claimed

<https://californiachaparral.org/fire/dead-trees/>

7. Why the current Cal Fire Vegetation Management Program (VTP) is flawed and will fail to adequately protect Californians

<https://californiachaparral.org/threats/cal-fire/>

Other helpful references/information

[Baker, B. and R. W. Halsey. 2020. California chaparral and woodlands. In, R. Berryman, Ed., Imperiled: The Encyclopedia of Conservation. Elsevier Inc.](#)

[Thorne et al. 2016. Climate Change Vulnerability Assessment of California's Terrestrial Vegetation](#)

[US Forest Service. 2011. Region 5 Ecological Restoration. Leadership Intent.](#)

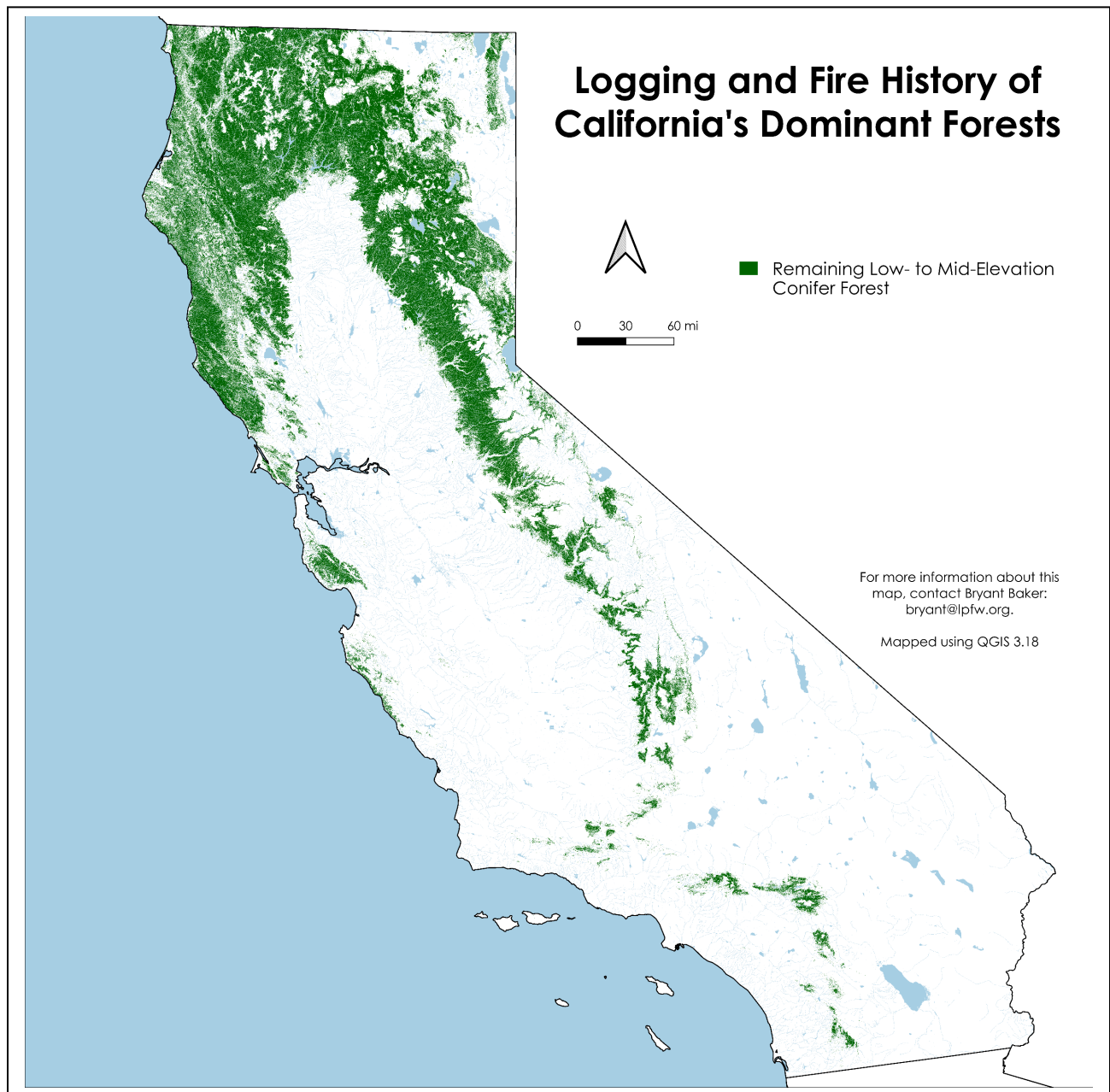


Figure 1A. Remaining low-to mid-elevation conifer forests in California. See Figure 1B for logging/fire impacts.

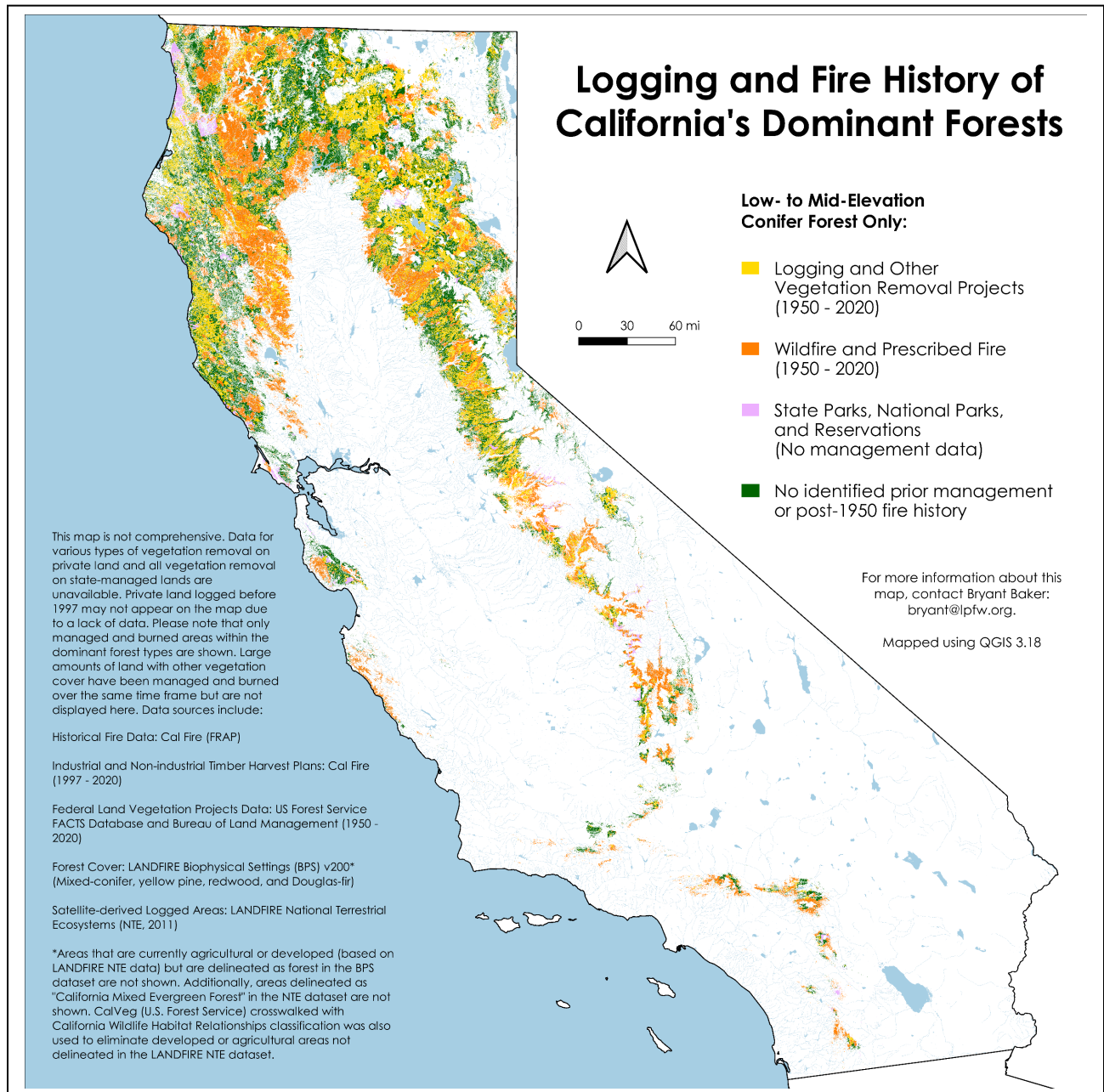


Figure 1B. Logging and fire history of California's low- to mid-elevation forests in California. At least 63% of California's remaining forests have either burned or have been logged since 1950.

From Thorne et al. 2016

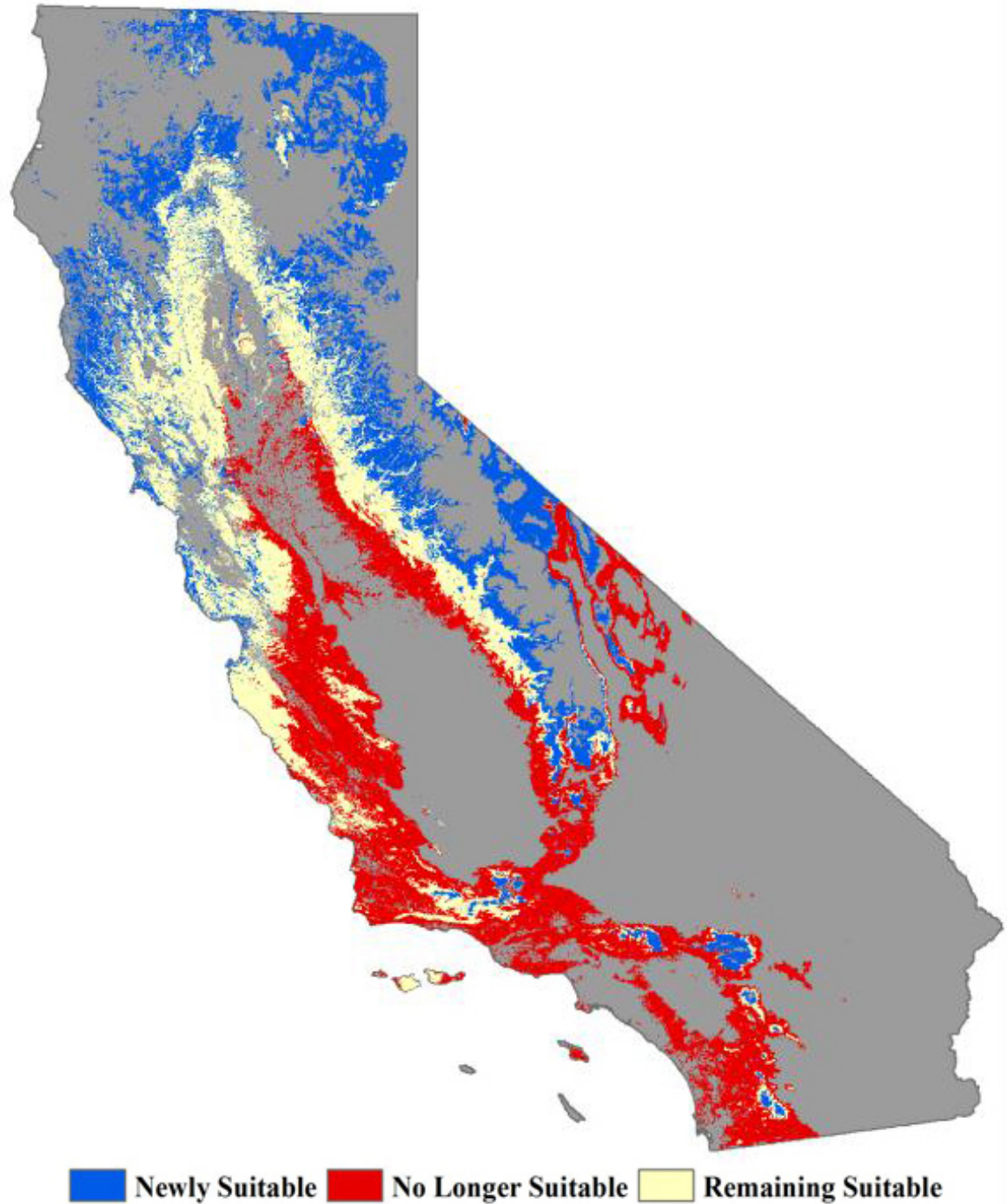


Figure 2. Under a future high emissions/hot and dry climate scenario for the time period 2070 - 2099, much of the area currently occupied by chaparral is predicted to be no longer be suitable for that plant community (shown in red). The likely replacement will be highly flammable, non-native weeds. From Thorne et al. 2016.

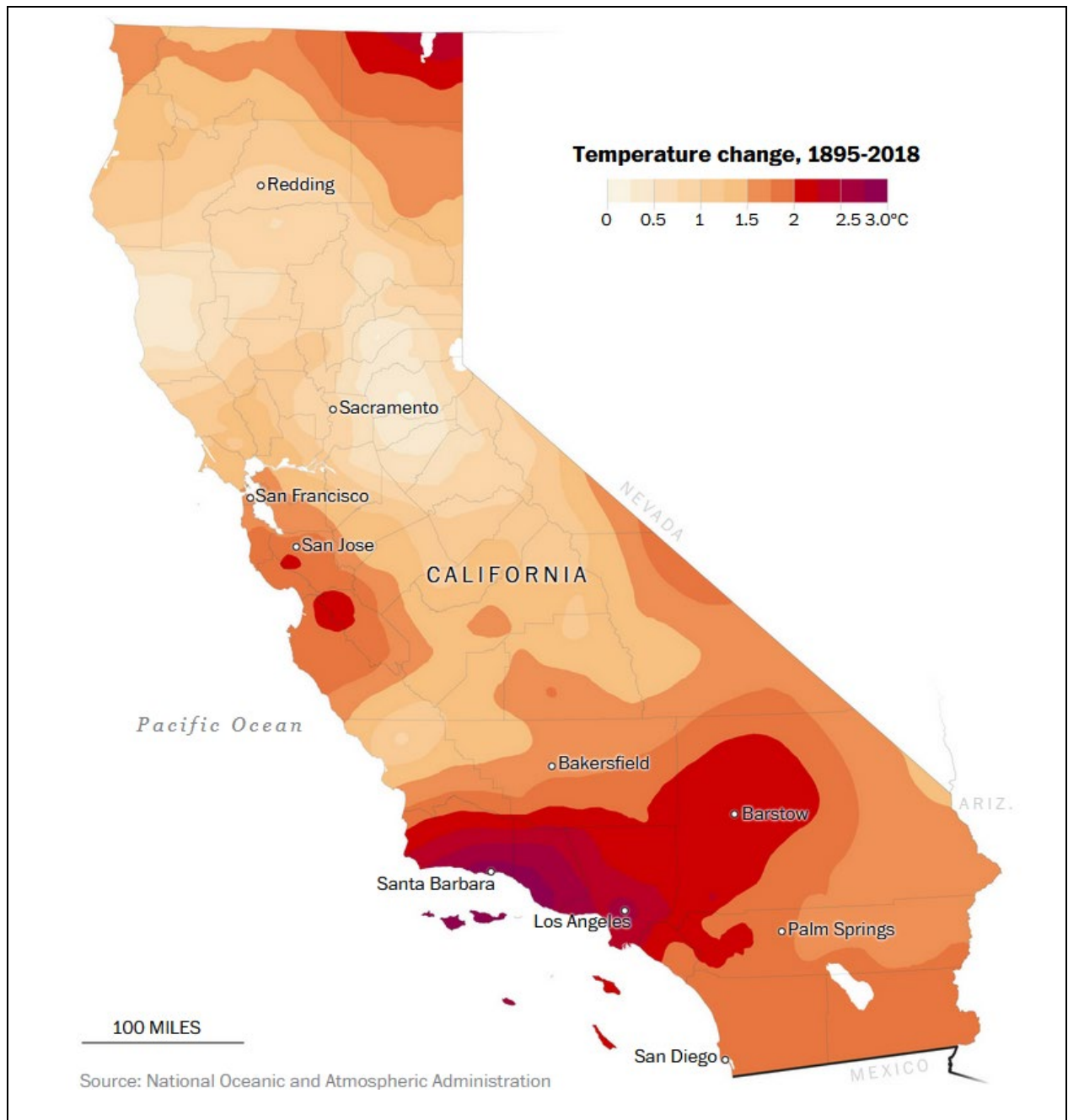


Figure 3. A warming climate means greater fire risk. Since 1895, the average temperature in Santa Barbara County has warmed by 2.3 degrees Celsius, according to The Washington Post's analysis. Neighboring Ventura County has heated up even more rapidly. With an average temperature increase of 2.6 degrees Celsius since preindustrial times, Ventura ranks as the fastest-warming county in the Lower 48 states. [From the Washington Post 2019.](#)



Figure 4 (above). California's most extensive ecosystem, the chaparral. Santa Barbara County.
Figure 5 (below). Post-fire forests are remarkably biodiverse, thriving habitats. Unfortunately, this habitat was logged, bulldozed, and replanted as it was deemed "unhealthy" by the USFS. Stanislaus National Forest.

