



August 1, 2011

Stan Dixon, Chair
State Board of Forestry
PO Box 944246
Sacramento CA 94244-2460

Dear Chair Dixon:

We are submitting this letter in regards to the recent inclusion of the SRA Fire Prevention "fee" upon parcels within the State Responsibility Areas (enacted by AB 29x). As an organization that represents almost every fire agency in our County, the Sonoma County Fire Chiefs Association is deeply concerned about the impact it will have locally and at its July meeting, unanimously voted to share these concerns with the State government and our public. Enclosed you will find for the consideration of you and your Board an overview of those concerns that we have already shared with the residents of Sonoma County.

First, as written the legislation remains vague. Because it does not recognize that most properties are also served by a Fire District, it is questionable how it can be implemented in an equitable manner. As you are almost certainly aware, even those who will be responsible for its implementation acknowledge that "a lot of details will need to be worked out." Such a disregard for the efforts of the local fire districts is an enormous oversight that will clearly need to be addressed and taken into consideration before any fee is to be charged.

The second concern revolves around the blanket approach created by the legislation regardless of the efforts that may have already been undertaken by a homeowner in the SRA. Since they are already required by law to maintain a defensible space (and many do), it is difficult to envision what the direct benefit will be for these homeowners who are charged the "fee". In reality, it penalizes the conscientious homeowner who has met PRC 4291 requirements since inspection efforts are minimized (compared to an owner who has taken no action). Furthermore, since the vulnerability of a home to a wild fire varies throughout our county (as do the prevention efforts that are needed to safeguard it), applying the same fee without consideration of the susceptibility of these areas further perpetuates this inequity.

To borrow a cliché, the "fee" will likely generate an enormous "unintended consequence" for many local agencies. (many all volunteer) who provide fire and EMS year round. Many of them have, through the election process passed (some by 2/3rds vote) local assessments to fund their services. In many cases the new Fire Prevention "fee" will more than double these local assessments and subsequently, make it very unlikely that voters would ever support any future increase for these local agencies. The potential loss of this revenue may ultimately result in a decline in fire and emergency medical services to these very communities. Ironically, this may ultimately impact their ability to also participate in the Master Mutual aid process which would mark a decline in fire protection statewide.

Finally, as every firefighter in California knows, most large conflagrations occur due to significant climatic conditions such as droughts combined with strong wind events and low relative humidity. As written, a fee that is designated to fund Fire Prevention activities will do little to prevent or offset the operational costs of controlling these fires.

While we recognize that you are not the body that can rescind the bill, we encourage you to advise the legislator of its flaws and at the least, take our concerns into consideration when you deliberate its implementation.

Sincerely,

Randy Collins,
President, SCFCA

Dan Northern,
Vice President SCFCA