

From: Charles Little [REDACTED]

Sent: Monday, February 27, 2023 10:33 AM

To: Petaluma Planning <petalumaplanning@cityofpetaluma.org>; John Schribbs <releafpetaluma@gmail.com>; Barnacle, Brian <bbarnacle@cityofpetaluma.org>; McDonnell, Kevin <kmcdonnell@cityofpetaluma.org>; Cader-Thompson, Janice <jcaderthompson@cityofpetaluma.org>; Healy, Mike <mhealy@cityofpetaluma.org>; Karen Nau <knau@cityofpetaluma.org>; Pocekay, Dennis <dpocekay@cityofpetaluma.org>

Subject: Wildfire Risk at Davidon/Putnam Park

---Warning: Use caution before clicking any attachments. THIS EMAIL IS FROM OUTSIDE OUR EMAIL SYSTEM.---

Friends,

I have only just now become aware of this (attached) analysis of the fire danger to homes and residents in the potential new Davidon development and to the folks living on both sides of Windsor Drive between Western Drive and D Street. We have come to that time in the history of building in wildfire prone areas, when we realize that it makes no sense to continue doing this if we want to save lives and property. As a neighbor of this plan, I hope you will consider this analysis very seriously in your consideration of Davidon's proposed development. Particularly in the light of a recent study by scientists at Montana and Colorado Universities showing that the vast majority of wildfire structure losses come from buildings in the wrong place and human caused ignitions. Here's a quote from the abstract of that study: "With millions of structures with high fire risk, **reducing human-related ignitions and rethinking how we build are critical for preventing future wildfire disasters.**" The lessons: humans cause most wildfires so don't put them in fire-prone areas, and homes should no longer be sited in fire prone areas.

As a close follower of wildfire related science I can assure you that the weight of science these days supports these conclusions. We must stop building in the places where wildfire is likely to occur.

Here's a link to the above mentioned study:

<https://academic.oup.com/pnasnexus/advance-article/doi/10.1093/pnasnexus/pgad005/7017542?login=false>

And here's the abstract:

"Abstract

Structure loss is an acute, costly impact of the wildfire crisis in the western United States ("West"), motivating the need to understand recent trends and causes. We document a 246% rise in West-wide structure loss from wildfires between 1999-2009 and 2010-2020, driven strongly by events in 2017, 2018, and 2020. Increased structure loss was not due to increased area burned alone. Wildfires became significantly more destructive, with a 160% higher structure loss rate (loss/kha burned) over the past decade. Structure loss was driven primarily by wildfires from unplanned human-related ignitions (e.g. backyard burning, power lines, etc.), which accounted for 76% of all structure loss and resulted in 10

times more structures destroyed per unit area burned compared to lightning-ignited fires. Annual structure loss was well explained by area burned from human-related ignitions, while decadal structure loss was explained by state-level structure abundance in flammable vegetation. Both predictors increased over recent decades and likely interacted with increased fuel aridity to drive structure-loss trends. While states are diverse in patterns and trends, nearly all experienced more burning from human-related ignitions and/or higher structure loss rates, particularly California, Washington, and Oregon. Our findings highlight how fire regimes – characteristics of fire over space and time – are fundamentally social-ecological phenomena. By resolving the diversity of Western fire regimes, our work informs regionally appropriate mitigation and adaptation strategies. With millions of structures with high fire risk, reducing human-related ignitions and rethinking how we build are critical for preventing future wildfire disasters."

Thanks for your attention to my concerns,

Charles Little

Charles S. Little

Fire Issues Chair

Forest Unlimited

[REDACTED]

Petaluma, CA 94952

[REDACTED]

<https://www.forestunlimited.org/>

From: Petalumans for Responsible Planning <PetRP@comcast.net>

Subject: Is fire a risk in Petaluma?

Date: February 25, 2023 at 5:59:55 AM PST

To: [REDACTED]

Reply-To: Petalumans for Responsible Planning <PetRP@comcast.net>

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Photo by Scott Hess

Is building in a Very High Fire Hazard Severity Zone a problem?

A report from Jason Neuman, Fire Consultant

After reviewing the Wildfire section of the RDEIR and FEIR Appendix about Wildfire, we had a number of technical fire questions about the RDEIR and FEIR.

Our organization contracted with Jason Neuman to review the wildfire sections.

Mr. Neuman's Background

Mr. Neuman is a retired Assistant Chief from CAL FIRE, Southern Region Headquarters. Mr. Neuman's past experience includes being a firefighter, fire investigator, fire captain, battalion chief, and senior fire planner. Mr. Neuman has written fire protection plans for new development projects, conducted fire behavior analysis and risk assessments. He has reviewed CEQA documents dealing with wildland impacts for long range planning and development projects.

Follow this link to see Mr. Neuman's Curriculum Vitae:

<https://www.petrp.org/issues-with-feir/wildfire>

Mr. Neuman's Report

Mr. Neuman posed a number of questions about the Davidon development wildfire plans.

Follow this link to read Mr. Neuman's Report:

<https://www.petrp.org/issues-with-feir/wildfire>

Below are a few quotes from Mr. Neuman's report.

“The EIR identifies the projects site within a Wildland Urban Interface Area according to Figure 4.15-2. The City of Petaluma Fire Prevention Bureau identifies this area as a Very High Fire Hazard Severity Zone (VHFHSZ) as identified on the city website and defined in Section 17.20.020 of the Petaluma Municipal Fire Code.”

“Figure 4.15-2 in the EIR has the VHFHSZ designation removed. This information is inconsistent with adopted documents and the EIR should reflect accurate information.”

“The question for the lead agency, will actions W-1, W-2 & W-5 become part of the conditions of approval or a form of mitigation? Should these programs/plans be in place prior to approving a new development project?”

“Section 4.12 Public Services of the Revised Draft EIR did not provide an accurate response time to the project area. The only information that was provided was a response time based on national standard thresholds. The EIR did not provide the total response time to the proposed project. This information could be confusing to the public reading the document.”

“The Wildfire Evacuation Transportation Assessment did not provide a contingency plan for the residents fleeing the area if egress was compromised or completely blocked to the north and south of Windsor Drive. The proposed development has one point of ingress and one point of egress with a cul du sac dead end road. The analysis also did not address persons without vehicles or access to vehicles and how they would evacuate safely.”

“The Revised EIR Section 4.15 references the Sonoma County Community Wildfire Protection Plan (CWPP) and provides an overview of the plan. It does not identify the significance or the relationship to the proposed development for planning purposes and entitlements.”

“The revised EIR did not address the applicable fire and life safety concerns in Appendix G of the State CEQA Guidelines sections with the determination of

significant impacts. It is presumed the proposed project would have significant impacts requiring the need for a Fuel Management Plan.”

“The 2020 LHMP Update identifies, the use of a Type VI fire engine. A Type VI fire engine may not have the capabilities to sustain an effective and desired fire flow to contain a wildfire in the project area or provide the needed protection to fire personnel in an emergency situation. Type VI fire engines have limitations compared to Type III engines listed in the LHMP. At this point, it is not confirmed if the Petaluma FD has a Type VI engine in service, staffed full time or cross staffed with other fire apparatus.”

“The information regarding Petaluma’s current roadways network indicates safety related issues. The current status of the roadways was not identified in the revised EIR. These roadway conditions will greatly affect emergency response capabilities by increasing response time. Emergency service vehicles will need to slow down to prevent unwanted damage to expensive fire apparatus.”

The Reality of Fire



The reality in Petaluma is that building decisions are typically made by local officials who also face pressure to provide housing and tax revenues. “A lot of people are wishing and hoping that wildfire risk wasn’t the new reality and haven’t quite adapted to the fact that it is,” said California Attorney General Rob

Bonta.

According to Stephanie Pincetl, director of the California Center for Sustainable Communities at UCLA., “No, you can’t just develop whatever you want to because you want to — that’s over. There’s no accountability in that over the long term.”

Last year, legislation was introduced to prohibit all new building in very high-fire-hazard areas. But the building industry argued that it would make it even harder to address the state’s housing shortage, and the bill failed to make it out of committee.

Residents are anxious about fuel conditions on large tracts of land near or abutting their homes, especially lands managed by State and County Parks (p. 42 in Sonoma County Community Wildfire Protection Plan report). The Davidon park property will be managed by the County Parks.

However, to Davidon, it makes prefect sense to build in this Very High Fire Hazard Severity Zone. Davidon has been trying to get these houses built for 20 years. So what if it is a high risk area? Everything can be mitigated. So what if an existing 2,466 people are already at risk from wildfire? That is not part of the environmental analysis. The Davidon homes are resistant to fires. Depending on the traffic flow on Windsor Drive, these 53 additional cars (1.89 vehicles X 28 homes) can easily escape to D Street.

Who cares about the existing residents? Not Davidon. They will build the houses and send the money back to Walnut Creek.

**City Council Meeting
Monday, February 27, at 6:30 p.m.**

See www.PetRP.org for details about this meeting.

Please write to the City Council or the City might not think that you care.

Last chance - Take our survey!

Have everyone in your household take the survey and forward it to your friends. We will be summarizing the comments and submitting them to the City Council on Saturday, February 25. Let your voice be heard!

SURVEY

Protect our Greenspace

Join us in preserving this jewel at the
gateway to Petaluma.

Please contact us with any questions: PetRP@comcast.net

Steering Committee for Petalumans for Responsible Planning:

Chris Cort, Sue Davy, Sherri Fabre-Marcia, Susan Jaderstrom

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