

Ms. Kathleen Seligman
46136 South Fork Drive
Three Rivers, California 93271

27 May 2010

Tulare County Resource Management Agency
Government Plaza
5961 South Mooney Blvd.
Visalia, California 93277

Attention: David Bryant, Project Planner

Re: General Plan 2030 Update and Environmental Impact Report

Dear Mr. Bryant,

Enclosed please find my comments regarding the General Plan Update and Environmental Impact Report with respect to the Urban and Wildland Fire Hazards included in the Health and Safety Element.

I appreciate that The Re-circulated EIR Draft addresses the significant threat of wildland fires in this county when it states, *"As future development occurs, wildland fires would continue to pose a significant threat to the people and structures of the County, in particular those residing in the Foothill Growth Management Plan and Mountain Framework Plan Areas, which are more susceptible to wildland fires due to potential fuel loads (grassland and other vegetation)."* Much thought and concern has been devoted to this pressing issue as it relates to fire season and climate changes as it goes on to say *"One of the primary factors contributing to the effective control of a vegetation fire is the rapid response by local fire units. This is especially true during fire season, when fire units may be committed to other fires and are unavailable to respond as quickly. Under future climate change conditions, more extreme weather conditions may occur that potentially results in greater fire fuel loads, a longer fire season, and/or a greater area containing vegetation susceptible to wildland fires. Climate change conditions could expose more people and structures to wildland fire potential"*

Within this GPU there is a comprehensive and thorough list of policies and implementation measures regarding the threat of wildland fires to Tulare County. And while I could analyze these policies and implementation measures as to their lack of clarity or the need for stronger language or request that some implementation measures be strengthened, this has been thoroughly addressed previously by Laurie Schwaller in her comments regarding the GPU dated December, 2007. Those comments continue to be pertinent because the policies and implementation measures addressed in that document are the same as in this GPU.

I find it more important to address an overall weakness in this document: The current DEIR fails to analyze how much new development would be allowed by the

GPU at build-out in areas assessed as high or extreme wildfire risk. This must be disclosed in the revised DEIR to allow a more comprehensive assessment of new fire risks posed by urban construction in fire-prone areas.

The DEIR goes on to state that the county will implement a variety of these policies designed to address fire hazards and minimize exposure of people and structures to fire hazards and that CEQA documentation will be prepared for future individual projects as they occur. Based upon this it declares that that the impact of fire hazards to be less than significant.

Please re-evaluate the fire risk that would be caused by the GPU by first analyzing how much new development would be allowed by the GPU at build-out in areas of high fire risk and then reanalyze the significance of this impact and whether mitigation is necessary.

The revised DEIR should compare the relative fire risks and financial burden to the county of the current, nearly identical alternatives in the DEIR, with the risks and costs of a healthy growth alternative that directs all future growth within existing boundaries served by existing fire-fighting districts. The revised DEIR or Final EIR should analyze the following approaches to lowering risk and costs of wildland fire in the General Plan Update:

- Mandatory impact fees on new development that reflect the true cost of providing fire protection and fuel reduction over the long-term
- Infill development within existing development boundaries which keeps fire emergency response time short and makes fire fuel-reduction programs more efficient.
- Restriction of new parcels in high hazard fire areas outside of fire district boundaries.

I thank you for considering these comments.

Most sincerely,

Kathleen Seligman