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August 24, 2018

Via Electronic Mail

Los Angeles County Regional Planning Commission
c/o Ms. Rosie O. Ruiz
320 West Temple Street, 13th Floor, Room 1350
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r Ruiz@planning.lacounty.gov

Re: Centennial Project Final Environmental Impact Report

Dear Commissioners,

As I write, there are almost 20 wildfires actively burning in California. Almost one million acres of land have burned in 2018. This is the second year in a row we are seeing historic levels of wildfires in California. What is perhaps most frightening is that burned area in 2018 is double that of 2017, and peak wildfire season is still approaching. This trend in increased fire activity extends back many decades. With rising temperatures, prolonged droughts, and urban developments in fire-prone areas fueling these fires, it is time that planners rethink how and where we build our homes.

As a professor researching fire disasters in sub-urban contexts, I am deeply concerned about the proposed Centennial project slated to put >19,000 homes in high and very high fire hazard areas. If we want to keep Californians safe, we can no longer ignore warning signs of immense fire risk. Building developments in fire prone areas will only lead to disaster. In fact, it is *the* most important cause of fire disasters. They will cause more human-induced conflagrations from things like arson, vehicles, improperly disposed cigarettes, or sparks from electrical power lines. They will also provide additional fuel from petroleum-based products in homes, such as wood interiors, paint, furniture, etc., which will facilitate the spread of larger and higher intensity fires where people are living.

I have experienced the chaos and destruction that wildfires at the urban interface cause first-hand. When I was a teenager living in Oakland, California, I was evacuated from my home during the 1991 Oakland Hills Tunnel Fire. More than 3,000 residential structures were destroyed, and 25 people were killed by that fire. Since then

I have dedicated my career to studying the interplay between urban development and environmental change, specifically focusing on the drivers and impacts of wildfires in the American West. These efforts recently culminated with the publication of a book titled *Flame and Fortune in the American West* (University of California Press).

To be sure, fires are ecologically important for California ecosystems, and historically they have been a natural occurrence throughout much of California's landscape. Areas would burn every 20 to 100 years, which would serve to clear out dead vegetation, provide important nutrients to the soil, and trigger reproduction in various plants. From the 1970s to the 1990s, California had an average of about 7,000 wildfires per decade, and each decade saw about 1.2 to 1.5 million acres burned. Although this may seem like a lot of damage, these fires were smaller, less deadly, less damaging, and more manageable than the more recent wildfires.

But today, we are now seeing larger, more frequent, and higher intensity wildfires. Fifteen of California's 20 largest fires in history have occurred after the year 2000, and much more land has been burned compared to previous decades. In the 2000s about 2 million acres burned in wildfires, and since 2010 over 2.3 million acres have burned.

These wildfires have severe health, social, and economic impacts because they occur in close proximity to human settlements. They cause deaths and injuries to residents and firefighters as well as trauma to the tens of thousands of people that have to evacuate their homes, lose their homes, and struggle to rebuild.

The costs of these wildfires have skyrocketed. Unfortunately, these costs are shouldered by California residents as well as state and federal taxpayers in the form of fire insurance premiums; management and upkeep of Cal Fire, California's Department of Forestry and Fire Protection; and federal government subsidies and hazard mitigation grants for homes in high risk areas.

Total cost of fire suppression (*e.g.*, personnel, equipment) and property damage (*e.g.*, burned down structures) in Cal Fire's State Responsibility Area was about \$600 million in the 1980s, while the cost from 2010 to 2017 is already \$6.6 billion (see Figure 1). The data presented do not include official damage costs from 2017 from Cal Fire; however, there was an estimated \$12 billion in insurance claims that year. That would mean \$18.6 billion in wildfire costs between 2010 and 2017, a 30-fold increase from the 1980s, with another severe fire season expected in 2018. California cannot sustain these patterns.

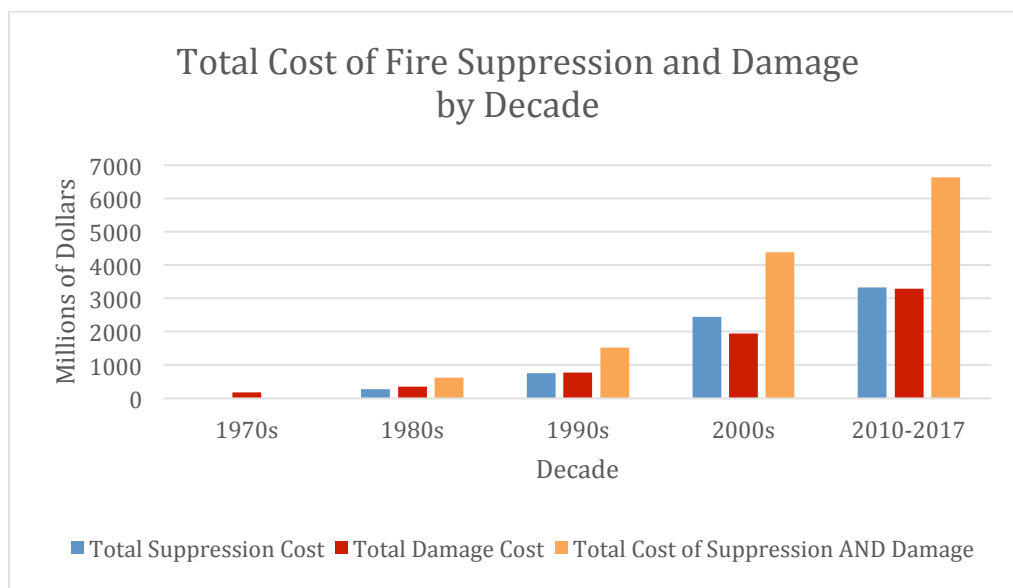


Figure 1. Total Cost of Fire Suppression and Damage by Decade in State Responsibility Areas. Data do not include 2017 damage costs. Data source: Cal Fire.

The proposed Centennial development would only exacerbate these already startling statistics. California’s fire regime is being disrupted, and urban settlements extending into areas that are historically prone to wildfires are to blame. If California continues to grow its cities outwards, its residents will inevitably suffer from increasingly deadly and damaging wildfires.

The lessons here are loud and clear. We need to reform our growth strategies by discouraging developments in high fire risk areas and pushing cities to allow for greater densities. Urban planning and design should focus on infill developments in urban core areas, where people have access to jobs, public transit, and community. We can no longer dismiss California’s natural fire regime, the impacts of climate change, or the direct relationship between urban sprawl and costly and dangerous wildfires. Please say “NO” to Centennial.

Thank you for your time.

Sincerely,

Gregory Simon

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