

August 22, 2018

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Re: Centennial

Dear Mr. Sackett,

I wish to comment on some of the assumptions the Centennial plan makes about mitigating for wildfire. The fire research community and fire responders are increasingly skeptical of prescriptions to “fire safe” the landscape. Fire behavior is changing across the state’s wildland-urban interface areas (WUIs). Fires are getting bigger, faster, more erratic and more destructive (Strader 2018). Ember ignitions challenge reliance on defensible space. Fires keep breaking records in California. Of 20 largest fires since 1932, 14 have been since 2000, and six since 2012 (Pope 2018). The cost of fire in the WUI is being externalized to all of us as fire agencies are called to fight fires at the cost of billions of dollars each year (Reilly 2015). As a resident of California, a county planning commissioner in a fire-prone region, and member of the Northern Sacramento Valley Chapter of the California Association of American Planners, I believe I have a stake in opposing this development.

The plan states that the area for the project encompasses land classified by Cal Fire as high or very high fire severity zone. The surrounding vegetation is known to be combustible, and the dry, hot and windy conditions at the site will continue to produce wildfires. Much of the terrain is steep, which accelerates fire and aggravates its containment. There have been 31 wildfires of over 100 acres on or near the site between 1964 and 2015. The plan calls for medium and low density development, similar to WUI neighborhoods such as Keswick Estates (Redding), The Trails (Rancho Bernardo—San Diego) and Coffey Park (Santa Rosa)—all which were destroyed in wildfires in the last decade.

I am not saying that because those developments burned that Centennial will suffer the same fate, or that these measures should be abandoned in existing WUIs. I’m saying that despite them, quasi-suburban places, with ample hardscapes and irrigated, non-flammable vegetation, have suffered huge losses during WUI fires. One-third of the homes that burned in the Trails subdivision in San Diego were “hardened” (Maraghides and Mell 2011). Burned-out residents (and most of us who read about their plight) are shocked to learn that such a mix of cement, lawns, pools, and paved roads would ignite as they have in San Diego, Redding, Santa Rosa, Santa Barbara, and so on. The Centennial project is essentially leapfrog development, as it will be surrounded on all sides by undeveloped land. This makes it the most vulnerable of any kind of WUI (Syphard et al. 2013).

The plan makes only a vague distinction between the needs for fighting structural (urban) fires and wildland fires. The plan says it will locate four fire stations in the development, which would create a

response time of no more than five minutes to any place on the site. That is fine as far as responding to individual fires starting within town goes, but it hardly addresses the scenario of a wildfire that comes into Centennial from the outside, or that is started by people from within the development (or commuting to and from home, or recreating in surrounding areas) and spreads to adjacent wildland vegetation.

Dealing with conflagrations involves many agencies which must be reimbursed. Fires in California this year got help from as far away as Australia and New Zealand. If the state requires classification of land by fire risk, as noted above, under what circumstances can you justify moving tens of thousands of people (and their life's savings) into harm's way and assuming that other agencies will come to the rescue when state or county resources are already scarce or unavailable during wildfire season (Reilly 2015)?

The Centennial plan says the developers will mitigate with vegetation clearance and building standards. Management practices give a false sense of safety and lead to more development in places that are at high risk for fire (Butsic, Kelly and Moritz 2015). The reliance on vegetation management to create defensible space is wishful thinking. Fire researchers are unconvinced that such "Firewise" landscapes are enough to defend communities from the generation of wildfires that the state is experiencing. Fire breaks help but embers caused 2/3 of the destruction of homes by the Witch and Guejito fires in San Diego's Trails neighborhood in 2007 (Maranghides and Mell 2011). An unknown number of homes were burned by neighboring ignitions in these suburbs Gonzalez-Mathiesen and March 2018). The Centennial plan promises to remove untold acres of native vegetation to improve the chances of the community to survive a wildfire, without solid research to back this assumption up. In the process, such clearing will destroy habitat for native species. County planning cannot ignore biodiversity, agriculture, and conservation all in the name of hazard mitigation (Mann et al. 2014)—especially when the evidence for success is missing.

Firefighting units are increasingly skeptical about putting their personnel at risk during WUI wildfires to defend property when they perceive that the owners have not done enough to create defensible space or have done so incorrectly (McNeal 2011). WUI communities are notorious for inconsistent compliance with the arduous and expensive process of keeping properties cleared.

Prevention through landscape engineering will not work. The defensible space solution touted by this project shows that it is out of touch with the reality of wildfire in California and with countless studies that propose different solutions. The emerging consensus is to think of wildfire areas much like we see floodplains as "no go" zones.

I know your general plan supports this new town vision for the Antelope Valley, but everything we know about wildfire has changed since its writing. Fires keep breaking records in size, deaths, and numbers of structures destroyed, and the consensus is that we should steer growth away from the WUI. Millions of Californians already live in rural acreage that will subdivide and densify, but this process has been more gradual and the resulting footprint is known to be (relatively) more resilient to fire than WUI suburbs. The opposite can be expected from suburban growth in fire-prone areas. These develop quickly, they are the most vulnerable to fire, and their growth drives the catastrophic human toll of fire today.

Sincerely,

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