



BOARD OF DIRECTORS
Foresthill Fire Protection District

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August 15, 2019

John Michelini, Board President
Foresthill Fire Protection District
P.O. Box 1099
Foresthill, CA 95631

Bonnie Van Pelt
Bureau of Reclamation
7794 Folsom Dam Road
Folsom, CA 95630

VIA EMAIL

RE: Preliminary Auburn State Recreation Area General Plan/Resource Management Plan and Draft Environmental Impact Report

Dear Bonnie,

The Foresthill Fire Protection District provides fire and life safety services including Paramedic ambulance transportation to residents and visitors of the Foresthill Divide including areas of the Auburn State Recreation Area identified in park planning documents as the Cherokee Bar/Ruck-A-Chucky Management Zone, Foresthill Divide Management Zone, Upper Middle Fork Management Zone and portions of the Upper North Fork Management Zone. While Cal Fire is statutorily responsible for fire suppression on land designated as State Responsibility Area, and through agreements with State and Federal agencies, responsible for fire suppression on Federal lands within the Auburn State Recreation Area, the Foresthill Fire Protection District has overlapping fire suppression responsibility within the boundary of the Fire District and is the sole provider of ambulance transportation for the management zones identified above within the Auburn State Recreation Area.

As noted in Section 1.8.2 of the General Plan, CSP and Reclamation met with key stakeholders and agencies during the planning process. While the report indicates that several Federal, State and Local agencies were contacted, no contact was made, and no invitation was provided to the Foresthill Fire Protection District, in spite of the fact that a large portion of the planning area is directly served by the Fire District. Further, the General Plan on page 4-22 lists Guideline RES 10.2 as follows: Coordinate with applicable fire agencies in the planning of new or expanded recreation facilities. Incorporate feasible emergency access recommendations prior to constructing or expanding facilities. This coordination has not included the Foresthill Fire Protection District.

As a result of not being identified as a stakeholder agency, the Foresthill Fire District has not been involved nor fully informed as to the progress of the planning process underway for the last few years. It is with regret that we enter the discussion at this late hour.

Following a review of the Preliminary General Plan/Resource Management Plan and the Draft Environmental Impact Report, the Foresthill Fire Protection District Board of Directors, after considering public comment, has voted unanimously to oppose the Preliminary Auburn State Recreation Area General Plan/Resource Management Plan and the Draft Environmental Impact Report as published.

It is the position of the Fire District that the General Plan and Environmental Impact Report both fail to adequately identify impacts and present an unacceptable increase in risk to public safety for the residents of the Foresthill Fire Protection District as a whole and in particular to residents of the Monte Verde, Todd Valley, and McKeon Ponderosa neighborhoods. Increased utilization and development of the Auburn State Recreation Area served by the Foresthill Fire District will have a direct impact on level of service available to the taxpayers within the District as resources are diverted to provide fire, ambulance, and rescue services to the Auburn State Recreation Area, a facility that does not contribute to the local cost of those services.

In addition to depleting scarce fire and life safety resources, increased utilization identified in the plan WILL create a significantly increased risk of wildfire directly impacting life safety and property within the Foresthill Fire Protection District.

*According to the General Plan document (Page 2-40), the steep canyons of the North and Middle Forks of the American River create challenging firefighting terrain. CAL FIRE identifies Fire Hazard Severity Zones at a local, state, and federal level, which cover all fire-prone areas in the state, regardless of land ownership or responsibility. CAL FIRE has designated most parts of ASRA/APL as Very High Fire Hazard Severity, the most extreme fire danger rating. **Historical fire occurrence data show that almost all wildfires started within ASRA/APL were caused by human actions. Ignitions largely involve fire play (e.g., the use of fireworks), vehicles sparks, and other human-produced sources.** Additionally, on page 3-8 the General Plan states: Statewide, the frequency, extent, and intensity of wildfires are expected to increase in the future as a result of climate change (CAL FIRE 2007b). California's Fourth Climate Change Assessment Statewide Summary Report (<http://www.climateassessment.ca.gov/>) states that climate change will make forests more susceptible to extreme wildfires. The risk at ASRA/APL is exacerbated by the remote and inaccessible nature of much of the land, which makes emergency evacuation and suppression access difficult in portions of ASRA/APL.*

The increased risk of wildfire is well documented in the General Plan and Environmental Impact Report but does not appear to influence planning direction or decisions. While the Environmental Impact Report does consider a wildfire mitigation plan, the effort is entirely inadequate and does not represent a serious effort to reduce the risk on surrounding communities attributed directly to increased utilization and development of Auburn State Recreation Area facilities.

Further, the General Plan and Environmental Impact Report both fail to identify medium to high density residential housing in the areas above the Middle Fork that are identified in the Placer County Hazard Mitigation Plan as representing the most concentrated residential development in the wildland/urban interface in the county. The areas directly above the Ruck-A-Chucky Management Zone have over 1500 residential structures and over 4000 residents. Fire risk and infrastructure concerns in these areas are

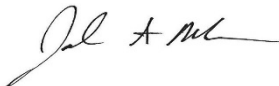
well documented in the 2012 Placer County Community Wildfire Protection Plan and the Placer County Hazard Mitigation Plan but are absent in the Preliminary General Plan and Environmental Impact Report.

Another community impact not considered in the Environmental Impact Report is the effect of recreational resources, especially camping, on the ability for homeowners to obtain hazard insurance. One District constituent has contacted the Fire District to report that their insurance had been non-renewed in part due to the proximity of campsites to their home. Among other concerns, the Senior Program Manager at Lighthouse Risk and Insurance Solutions listed as cause for denying coverage the following statement: "At the bottom of the canyon there is recreational exposure". It is clear that the insurance industry recognizes the increased risk of recreational activities in the wildland urban interface and is taking steps to reduce their exposure. This type of hazard insurance denial could be exasperated by further development and increased utilization of the areas around and below Foresthill.

The Foresthill Fire Protection District stands with the community of Foresthill in opposing further development and increased utilization of the Auburn State Recreation Area until such time that adequate relief from obvious community impacts can be completed, and appropriate support for fire and life safety service impacts mitigated.

In closing the Foresthill Fire Protection District respectfully requests that the District be recognized as an agency stakeholder and be included in future planning meetings, communications, and requests for information.

Professionally yours,



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Foresthill Fire Protection District

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Cc: Chief Brian Estes, Cal Fire Unit Chief
Todd Leopold, Placer County CEO
Cindy Gustafson, District 5 Supervisor
Brian Dahle, Senator California District 1
Holly Powers, Placer County OES