

BOARD OF FORESTRY AND FIRE PROTECTION

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October 12, 2015

Chris Calfee
Chief Counsel
Governor's Office of Planning and Research

Via email

Dear Mr. Calfee,

The Board of Forestry and Fire Protection (Board) would like to issue comment on the proposed updates to the CEQA Guidelines Preliminary Discussion Draft.

This document acknowledges changing environmental conditions that result from natural disaster, drought, or other events, and to the end the Board has the following suggested change to § 15155 on page 88:

(3) An analysis of circumstances affecting the likelihood of the water's availability, as well as the degree of uncertainty involved. Relevant factors may include but are not limited to, drought, salt-water intrusion, regulatory or contractual curtailments, *use of the water to fight wildfires in or near the project*, and other reasonably foreseeable demands on the water supply.

Reports from CAL FIRE firefighters in the field indicate that as human development moves further into the wildlands and the drought continues to limit water resources, firefighters have had to go further away from the wildfire front to find available water sources, and in some cases have run out of water sources to utilize in the wildfire fight. The Board recommends including the above italicized language so project proponents may contemplate the availability of water sources for their project should it or a nearby project be under threat from wildfire to the point that existing water sources are substantially diminished.

Please feel free to contact me for any further clarification or discussion on this issue.

Sincerely,

Edith Hannigan
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