

# Plumas County Fire Safe Council



Board of Forestry and Fire Protection  
Attn: Edith Hannigan, Board Analyst  
P.O. Box 944246  
Sacramento, CA 94244-2460

April 27, 2016

RE: Adoption of CCR 1666.0 through 1666.16

Members of the Board:

The Plumas County Fire Safe Council has reviewed these draft regulations concerning grants from the SRAFFP. We feel that they fairly reflect the program as it has become established during the 2014 and 2015 grant cycles. We wish to make comment in two areas:

First, as we experience the wind down of Federal Secure Rural Schools and Communities Title III funds, we are concerned that future SRA grants be available to support the cost of fire safe council coordination. Without coordination it will become difficult or impossible to sustain our mission. Under section 1666.5 on "Qualifying Projects", we find no provisions that specifically support grants for this purpose.

Second, draft section 1666.2 on "Grant Distribution" seeks to insure a geographic distribution of grant funds that is proportional to the number of SRA rate payers. We strongly support this goal. However, we do not understand why the draft regulations seek to achieve this on the scale of CAL FIRE units and not by County. The stated rationale is that most CAL FIRE reporting is already done on a by unit basis, and that it would add to the administrative workload to track grant benefits for 58 Counties vs. 26 CAL FIRE units. In Plumas County, and we assume in most other Counties, these SRA grant projects are carried out by organizations that have either very local objectives, or at the most a county-wide perspective. The table below illustrates the issue and the concern within our local CAL FIRE unit:

County	Habitable Structures (%)*
Lassen	5,543 (31%)
Modoc	1,825 (10%)
Plumas	10,715 (59%)
Total	18,083 (100%)

\*FY 2011/12 SRA - Number of Billings

In light of the above distribution and with Plumas County benefiting from a limited CAL FIRE presence it is imperative that the distribution of SRA funds to Plumas County is open and transparent.

The underlying SRA legislation mandates that the Board of Forestry issue an annual report on use of the fund which will “*include an evaluation of the **benefits received by counties** based on the number structures in SRA within their jurisdictions, the effectiveness of the board’s grant programs, the number of defensible space inspections, etc...*” (PRC 4214 (f)). The SRA legislation anticipates that the evaluation of proportionality of SRA benefits be done **by County**. In the past, while we have requested this report from the Board of Forestry and from CAL FIRE, we have not received a copy.

Thank you for the opportunity to provide comments.

Sincerely,

A handwritten signature in black ink that reads "M. Callaghan". The signature is written in a cursive, flowing style.

Mike Callaghan  
Council Chair