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July 3, 2019

The Honorable Cecilia Aguiar-Curry
Chair, Assembly Local Government Committee
1020 N Street, Room 157
Sacramento, CA 95814

RE: Senate Bill 182 (Jackson) Local government: planning and zoning: wildfires - Oppose

Dear Chair Aguiar-Curry:

The California Building Industry Association (CBIA), representing the state's approximately 3,000 homebuilders and land developers involved in the home construction industry, writes to inform you that we Oppose SB 182 and have designated it as a Housing Killer. As California continues to grapple with an unprecedented housing affordability crisis, the Housing Killer list is reserved for those specific legislative proposals that will most exacerbate the housing crisis.

However, it should be noted that CBIA has been conducting numerous and very productive meetings with the author's staff and the sponsors of the bill. Several of our concerns with what we viewed as vague and ambiguous references in the general plan provisions have been addressed by the amendments made in the May 24th version of the bill.

The remaining issues of concern to CBIA relate to the proposed reference, in statute, of numerous national wildland fire safety standards which would create conflict with existing, similar regulations already in effect throughout California. For a 3-year period (2020-2023), this would set the stage for unintended confusion in the field. As an alternative, CBIA is suggesting amendments to the bill which require the Office of the State Fire Marshal and the Board of Forestry to adopt updates to these existing regulations on a very regular basis for the next twelve years. Also, our proposed amendments will require our agencies to consider national wildland fire safety standards, including those currently referenced in the bill, as they go about adopting updates to the Title 14 SRA Development Standards and the Title 24 WUI Building Standards.

As the state grapples with the increased risk of wildfires, CBIA has been at the forefront of these discussions for years—working collaboratively to advance cutting edge policy at the state and local level. CBIA has long supported hardening homes and increasing the stringency of fire-resistant building codes. We supported and participated in all the updates to these building codes. We supported the establishment of defensible space

laws since they were established in the 1990s and have supported multiple efforts to enforce defensible space rules. We have conducted classes on the laws applicable to the Wildland-Urban Interface (WUI) for building officials and, we are sponsoring SB 190 (Dodd) – a measure that increases education and implementation of the WUI building standards and defensible space statutes. And, with the inclusion of our amendments into SB 182, CBIA will look forward to continuing its participation in the updating of these important state regulations.

We are hopeful our code-related amendments will be accepted which will enable us to remove our current position of opposition to this bill.

Please contact me at (916) 340-3338 if you have any questions about our position.

Sincerely,

A handwritten signature in black ink, appearing to read 'm. gunning', with a long horizontal flourish extending to the right.

Michael A. Gunning
Senior Vice President of Legislative Affairs

cc: Senator Hannah-Beth Jackson
Members, Assembly Local Government Committee
Committee Consultants, Assembly Local Government Committee