

California Alliance for Nature



... the collective voice of organizations and individuals for Nature

March 12, 2021

California State Legislature
Sacramento, CA

Re: The Proposed Wildfire Budget – Lives and homes first

Dear Honorable Member of the California State Legislature,

The Newsom administration's new budget proposal to address wildfire risk has, for the first time, allocated funds to support proven strategies that will save lives and protect homes – focusing directly within and around communities at risk to make them fire-safe.

This is a hopeful beginning. However, **only 5% of the proposed \$1 billion budget will be available to communities to protect themselves from wildfire.** The rest, \$922 million, is being allocated for plans to fund the clearance of half a million acres of habitat per year including the logging of forests far from most communities at risk – an approach that has consistently failed to protect our neighborhoods from wildfire and will cause significant damage to the natural environments we treasure.¹

Primary Goal: Make saving lives and homes the top priority.

Key Metric: Nine out of the 16,909 fires in California during 2017 and 2018 caused 95% of the damage. All nine fires occurred under extreme, wind-driven conditions where vegetation clearance projects proved ineffective. Nearly all the most devastating wildfires in California since the 1991 Oakland Hills Fire exhibit similar characteristics, and most had little to nothing to do with forests. A comprehensive fire management plan **must focus on wind-driven fires where most fatalities and**

¹ **The proposed budget:** \$512 million for landscape-scale habitat clearance projects, \$335 for 45 or more fuel breaks, \$75 million in incentives to timber companies, \$39 million for lidar remote sensing research. For direct community fire protection, \$113 million allocated for home hardening/infrastructure of which 50% would need to come from matching federal grants = approximately \$56 million of state funds, or about 5% of the entire budget.

Source: [San Francisco Chronicle, 1/8/2021.](#)

home losses occur. The current approach focuses on the fires and environments that pose the least risk to our communities.

1. Fund Proven Strategies for the Protection of Communities

The scientific consensus is overwhelming concerning the most effective way to protect lives and communities from wildfire – **focus on making homes fire resistant**, reduce flammable materials within 100 feet around them, and prevent developers from placing neighborhoods in harm’s way (e.g., SB 55, introduced by Senators Stern and Allen, and AB 1295 introduced by Assembly Member Muratsuchi). This focus is critical because the most devastating fires in California are wind-driven, casting billions of hot embers miles ahead of the fire front. **It’s the embers that destroy our communities like Santa Rosa, Paradise, Ventura, Oakland, Malibu, and San Diego, not the flames from burning forests or shrublands.**

Wildfire risk reduction funds need to be spent on proven strategies [\(1\)](#). **Anything less takes away opportunities to save more lives and homes.**

Recommendations: Require 50% of proposed funds be used within 100 feet of homes to help vulnerable communities (especially low-income) retrofit flammable structures, install fire suppression systems (e.g., exterior sprinklers), and create appropriate defensible space. Funds should also be made available to identify the most at-risk neighborhoods and standardize home wildfire safety inspections.

2. Fund Proven Strategies for Management/Restoration Projects

California has the greatest habitat diversity of any other state in the U.S. Therefore, vegetation management projects **must be developed on a regional basis** (e.g., AB 1255, introduced by Assembly Member Bloom) and based on the best available science.

To the detriment of fire safety, the pervasive false narrative, one that is reflected in the proposed budget, is that forest mismanagement and past fire suppression are responsible for our devastating wildfires. President Trump leveraged this false narrative when blaming California for not doing enough raking of the forest floor. This narrative is repeated so many times without question that logic has all but been abandoned. After the Woolsey Fire in Malibu, news stories suggested thinning forests and removing dead trees was the solution – Malibu, where the nearest forest is more than 30 miles away.

Contrary to conventional wisdom, **there is significant scientific disagreement** when it comes to the effectiveness of logging forests to reduce community fire risk and the size and severity of wildfires [\(2\)](#). The wildfire budget needs to reflect this instead of allocating more than 90% of the funds on questionable strategies.

Forests

California's forested landscapes have been severely damaged by past and current efforts to extract timber and other natural resources. The fire suppression narrative has diverted attention away from this history of damage by past logging, promoting additional logging and habitat clearance in an attempt to reduce fire risk. The effectiveness of such an approach is strongly challenged by hundreds of scientists (3).

The perspective that our forests are "clogged" with vegetation or "over-forested" due to more than a century of fire suppression is a serious misnomer. **At least 63% of California's low- and mid-elevation conifer forests have either been logged or burned since 1950** (see maps, Figure 1).

There are approximately 27 different types of tree-dominated ecosystems in the California, 16 of which are traditional forest types with a substantial conifer component and a relatively tall overstory in maturity. From coastal redwood forests to subalpine forests, the diversity of these ecosystems and the tree species therein is vast and complex. Regardless, most forest types experience some form of mixed-severity fire regime, meaning that fires—even when large—burn with a variety of effects and leave behind mostly low or moderately burned forest interspersed with severely burned patches. Some forest types, such as closed cone pine-cypress ecosystems that are dominated by species such as knobcone pine or Sargent cypress, burn mostly at high severity and have done so for millennia.

Without recognizing the wide diversity of forests in California, one-size-fits-all solutions are often proposed, potentially causing significant ecological damage when implemented.

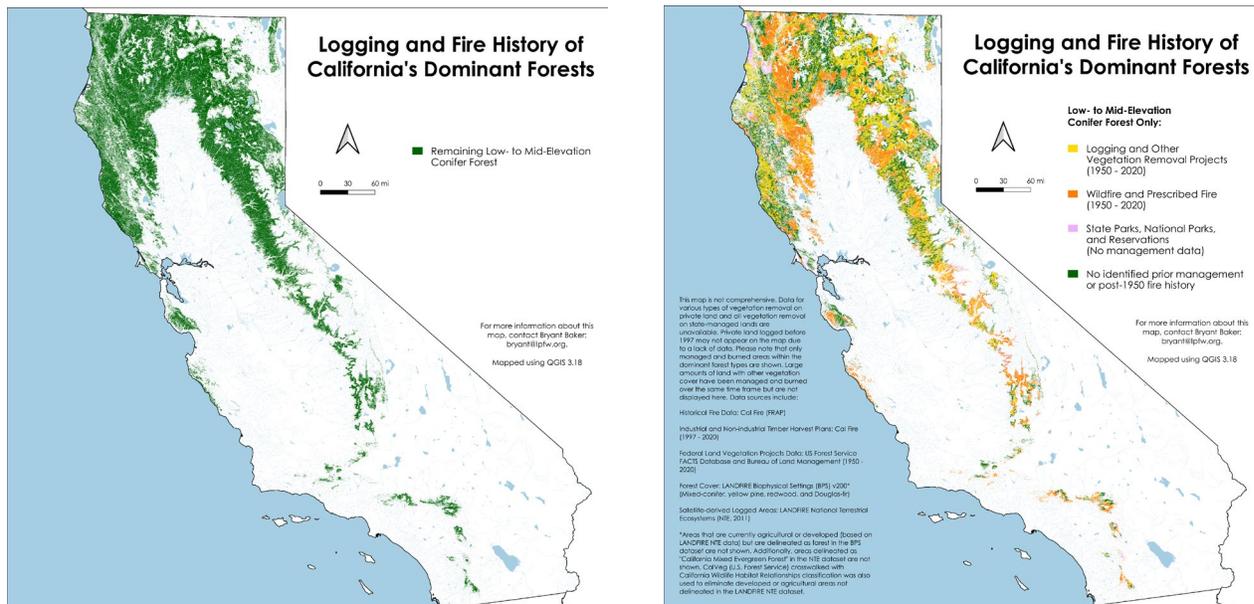


Figure 1. At least 63% of California's low to mid-elevation conifer forests (green) have either been logged or burned since 1950 (colored overlay to the right). See larger versions at the end of this letter (Figures 1A and 1B).

We must accept the fact that large, high-intensity fires are inevitable and are **primarily dependent on weather conditions (e.g., drought, low-humidity, wind), not the condition of the forests.** Attempting to make forests “resilient” to fire through logging, mastication, and herbicide spraying will only make matters worse by adding additional disturbance to already damaged ecosystems (Figure 2).

Chaparral/Sage Scrub

Native shrublands, especially chaparral, represent California’s most extensive ecosystems (Figure 5). These systems are **threatened by too much fire** (4). Both federal and state agencies have recognized this threat:

- California’s Climate Change Vulnerability Assessment of the state’s terrestrial vegetation predicts **chaparral will likely disappear** throughout much of southern California within the next century if current trends continue (Figure 3).
- The United States Forest Service established a new leadership intent to protect chaparral in California because human-caused fires have increased fire frequency to the extent that **chaparral can no longer survive** and is being replaced with non-native annual grasses at an alarming rate (USFS 2011).
- The California Board of Forestry’s Vegetation Treatment Program (VTP) states that, “coastal sage scrub and chaparral, **are experiencing fires too frequently**, resulting in changes to their ecology.”
- The California State Legislature amended the Public Resource Code (PRC 4483) to mandate additional consideration for chaparral and coastal sage scrub plant communities that **are being increasingly threatened by fire frequency.**

Chaparral provides critical ecosystem services, especially watershed protection, as well as habitat and intrinsic value. Therefore, to protect the chaparral that remains in California, **we must look forward and not repeat past mistakes**, and mitigate for increasing fire frequencies that climate change will likely cause.

In the past when rangeland management goals dominated the discussion, there were efforts to prescribe burn or eliminate older chaparral stands. It was also believed that such an approach would benefit fire management goals. However, research over the past two decades has rejected these older perspectives. As a consequence, **prescribed burning is no longer considered a reasonable approach to chaparral management**, especially in southern California (5).

Considering climate change causing warmer, drier environments (Figure 4) and increased fire frequencies, we need to **keep fire out of old-growth chaparral as much as possible.** In addition, the research has made it clear that when prescribed burns are typically conducted in the chaparral (during the late spring), chaparral can be damaged irreversibly, type-converting to weedy grasslands. Unlike native species, these weedy grasslands are highly flammable and ignite readily. This is why the chaparral-dominated Santa Monica Mountains National Recreation Area turned away from prescribed burning in 2005. Vegetation treatments, such as mechanical thinning, are

similarly damaging and will cause type conversion (elimination/reduction of dominant shrub species, loss of canopy cover, and/or invasion of non-native weeds and grasses).

Recommendations: Require 25% of proposed funds be used to develop **regional vegetation management/restoration plans** that reflect the complex diversity of California's natural environment. Vegetation management for the purpose of fire risk reduction should focus thinning vegetation along evacuation routes, within 100 feet of structures, and removing flammable invasive species to reduce ignitions. Preventing roadside ignitions makes great sense, as this is exactly where many fires start.

Restoration projects should address the actual causes of forest degradation (past logging/overgrazing) and reverse/prevent chaparral type-conversion (elimination/reduction of dominant shrub species, loss of canopy cover, and/or invasion of non-native weeds and grasses).

For chaparral and coastal sage scrub, the focus needs to be on reducing fire frequencies, the removal of flammable, invasive weeds and grasses, and preventing the ignition of intact stands. **Special consideration needs to be given to protecting old-growth chaparral (>50 years)** as very little is left in the state. Post-fire chaparral and sage scrub should be left alone to allow it to respond naturally. Considering the threat these habitats face due to increased fire frequency, **prescribed burning and other vegetation treatments outside of defensible space should not be considered** as per the Santa Monica Mountain National Recreation Area [fire management plan](#).

For forests, *wildfire* should be allowed to help heal the damage caused by more than a century of logging abuse. Nature provides the best vehicle for post-fire forests to thrive (Figure 6). Therefore, felling or removal of dead trees and replanting after fires should not occur except within less than 100 to 300 feet of communities to remove hazard trees and restore local parks and recreational areas. The use of prescribed fire should be limited to forests that have missed at least two fire rotations, with prioritization given to natural fire use (allowing lightning fires to occur safely away from communities). Despite dramatic predictions, the presence of dead trees and bark beetles have not led to catastrophic wildfires (6). In fact, tree mortality and the native bark beetles that dying trees attract represent natural processes of forest thinning, providing more ecological benefit than chainsaws and grinding machines.

Rewrite the current Board of Forestry's Vegetation Treatment Program (VTP) to create a new science-based plan reflecting the points offered in this document. As it currently stands, the VTP focuses exclusively on habitat clearance, fails to provide guidance to regional land managers regarding the prevention of type-conversion of shrublands, and fails to provide the type of state-wide guidance sorely needed to protect communities from burning (7).

3. Fund Comprehensive Fire Plans that are Regional

Considering the increasing rise in the loss of life and property due to wildfires in California, there needs to be a significant change in the fire management system. Doing more of the same is not logical nor is it preventing loss of life.

Recommendations: Require 25% of proposed funds be used to support local fire departments and districts to upgrade equipment, solve chronic coordination/communication problems, improve warning systems, develop functional evacuation plans, and form a connected network of local fire, conservation, and resource entities to oversee and coordinate the expenditure of wildfire risk reduction funds.

In order to create innovation solutions, it is imperative that these recommendations be overseen by a government entity that is relatively **independent and separate from Cal Fire**. The Office of Emergency Services may provide such a vehicle, with regional entities playing major roles in the distribution of funds and the creation/administration of funded projects.

Establish an interdisciplinary, statewide Fire Preparedness Task Force (FPTF) versed in Catastrophic Risk Management (CRM) to evaluate our response to wildfire hazard. CRM is successful because it helps managers in high-risk organizations make better decisions by reducing their tendency to “normalize deviance,” engendering a focus on positive data about operations while ignoring contrary data or small signs of trouble. The nearly tacit expectation of loss of life and property during wildfires is a symptom of normalizing deviance. Airlines use CRM to objectively analyze plane crashes, thereby creating safer planes. Without CRM, small deviations from standard operating procedures are often tolerated until disasters, such as the Deepwater Horizon offshore oil platform blow out, the Challenger Space Shuttle explosion, or unprecedented losses caused by recent wildfires expose an organization’s failures. Ensure that a majority of task force members can speak freely, enabling them to offer creative solutions, and that half of the membership is outside the fire profession.

Due to the current wildfire budget proposal’s focus on logging forests and habitat clearance, it will do little to protect communities like Coffey Park that burned in the 2017 Tubbs Fire, will increase fire risk by spreading non-native weeds and grasses, and will further compromise already ecologically compromised ecosystems.

However, we are encouraged by the initial funding proposal of direct community wildfire protection and by the Newsom administration’s promise that a wildfire risk reduction strategy needs to be **“not either, but both”** in relation to vegetation management and protecting communities – **we look forward to a wildfire budget that reflects this promise.**

While large, high-severity fires are inevitable, the destruction of our communities by those fires is not. Together we can develop a comprehensive fire management plan that successfully reduces fire risk in a manner that will protect our families and the natural environment.

Sincerely,

Richard W. Halsey
California Chaparral Institute
Escondido

Bryant Baker
Los Padres ForestWatch
Santa Barbara

Anne Jacopetti
350 Sonoma
Santa Rosa

Alan Levine
Coast Action Group
Santa Rosa

Angela Benson
Angela Benson Landscapes
San Diego

Kimberly Burr
Community Clean Water Institute
Forestville

Marilyn Woodhouse
Battle Creek Alliance
Manton

James Dryden
Crystal View Alliance
Tujunga

Larry Hanson
California River Watch
Sebastopol

Stacy McCline
Del Dios Habitat Protection League
Escondido

Nicholas Paul Walker
CampionWalker Garden Design, Inc.
Topanga

Jodi Levine
Earthroots Field School
Trabuco Canyon

Shaye Wolf
Center for Biological Diversity
Oakland

Brien Brennan
Elder Creek Oak Sanctuary
Red Bluff

Duncan McFetridge
Cleveland National Forest Foundation
Descanso

Dan Silver
Endangered Habitats League
Los Angeles

Veronica Jacobi
Climate Protection & Recovery Fund
Santa Rosa

Pamela Heatherington
Environmental Center of San Diego
San Diego

Nancy Levine
CNPS San Diego
San Diego

Susan Goldsborough
Families for Clean Air
Mill Valley

Diana Oppenheim
ForELK
San Francisco

Larry Hanson
Forest Unlimited
Forestville

Charles Little
Friends of Bell Meadow
Petaluma

Michael Wellborn
Friends of Harbors, Beaches and Parks
Newport Beach

Karen Asbelle
Friends of Knowland Park
Oakland

Pamela Berstler
G3LA, LLC (Green Gardens Group)
Los Angeles

Pam Young
Golden Gate Audubon Society
Berkeley

Teri Shore
Greenbelt Alliance
San Francisco

Claire Schlotterbeck
Hills For Everyone
Brea

Lisa Levinson
In Defense of Animals
San Rafael

MarieClaire Egbert
John Muir Project of Earth Island Institute
Lancaster

Kim Lamorie
Las Virgenes Homeowners Federation, Inc.,
of the Santa Monica Mountains
Santa Monica Mountains

Erin Axelrod
LIFT Economy
San Francisco

Sylva Blackstone
Los Angeles Tree Coalition
Los Angeles

Patt Healy
Malibu Coalition for Slow Growth
Malibu

Georgia Goldfarb
Malibu Monarch Project
Malibu

Joseph Migliore
Mt. San Jacinto Natural History
Association
Cathedral City

Mary Brooks
Mountain Progressives
Frazier Park

Beth Burnam
North Topanga Canyon Fire Safe Council
Topanga

Occupy Sonoma County
Santa Rosa

Cris Sarabia
Palos Verdes Peninsula Land
Conservancy
Rancho Palos Verdes

Paul Faulstich
Pitzer College, Program in
Environmental Analysis
Claremont

Leana Adams
Poly/Ana
Altadena

Y. Elliott
 Pomona Valley Audubon Society
 Claremont

Van Collinsworth
 Preserve Wild Santee
 Santee

Roberta Lyons
 Redbud Audubon Society, Inc.
 Clearlake

Tom Dudley
 Restoration Science LLC
 Santa Barbara

Susan Phillips
 Robert Redford Conservancy for
 Southern California
 Sustainability at Pitzer College
 Claremont

Travis Kemnitz
 San Diego Audubon Society
 San Diego

Daniel McCarter
 Santa Barbara Urban Creeks Council
 Santa Barbara

Duncan McFetridge
 Save Our Forest and Ranchlands
 Descanso

Ara Marderosian
 Sequoia ForestKeeper®
 Kernville

Jack Eidt
 SoCal 350 Climate Action
 Los Angeles

Wayne Morgenthaler
 Sonoma County Pachamama Alliance
 Petaluma

Richard Dale
 Sonoma Ecology Center
 Sonoma

Tom Stout
 Stout Design Build, Inc.
 Culver City

Julianne Ewry
 TreeGirl Studios LLC
 Santa Rosa

Jack Gescheidt
 TreeSpirit Project
 San Rafael

Tina Rasnow
 U4EA Ranch Enterprises, Inc.
 Newbury Park

Tom Dudley
 UCSB Riparian Invasion Research Lab
 Santa Barbara

Ben Stapleton
 U.S. Green Building Council-LA
 Los Angeles

Mike Splain
 Ventana Wilderness Alliance
 Santa Cruz

Bruce Schoppe
 Ventura Audubon Society
 Ventura

Jennifer Schultz
 Weekly Weeders
 San Diego

Monica Bond, PhD
 Wild Nature Institute
 Mariposa

Individual Signatories on page 17

The Science

A video presentation/discussion concerning the content of this letter is available here:

https://youtu.be/ILEPrIRS_m8

1. The Science of Protection for Homes from Wildfire

<https://californiachaparral.org/fire/protecting-your-home/>

2. The Mischaracterization of California Wildfires

A letter to the Los Angeles Times, explaining why there must be more objective reporting about wildfires in California:

https://static-cdn.edit.site/users-files/a045ad78962cde3564de3160ef5708c3/mischaracterization-of-california-wildfires_letter-to-lat-editors.pdf?dl=1

3. Open Letter to Decision Makers Concerning Wildfires in the West

https://californiachaparral.org/_static/cfb51ddaff2f3391f01916e48654242e/scientist-letter-wildfire-signers-2018-08-27-1.pdf?dl=1

4. Chaparral is Threatened by Too Much Fire

<https://californiachaparral.org/threats/too-much-fire/>

5. Why Prescribed Fire is Not Appropriate for Native Shrubland Ecosystems

<https://californiachaparral.org/threats/prescribed-fire/>

6. Dead Trees Provide Critical Habitat – they do not pose the fire risk often claimed

<https://californiachaparral.org/fire/dead-trees/>

7. Why the current Cal Fire Vegetation Management Program (VTP) is flawed and will fail to adequately protect Californians

<https://californiachaparral.org/threats/cal-fire/>

Other helpful references/information

[Baker, B. and R. W. Halsey. 2020. California chaparral and woodlands. In, R. Berryman, Ed., Imperiled: The Encyclopedia of Conservation. Elsevier Inc.](#)

[Thorne et al. 2016. Climate Change Vulnerability Assessment of California's Terrestrial Vegetation](#)

[US Forest Service. 2011. Region 5 Ecological Restoration. Leadership Intent.](#)

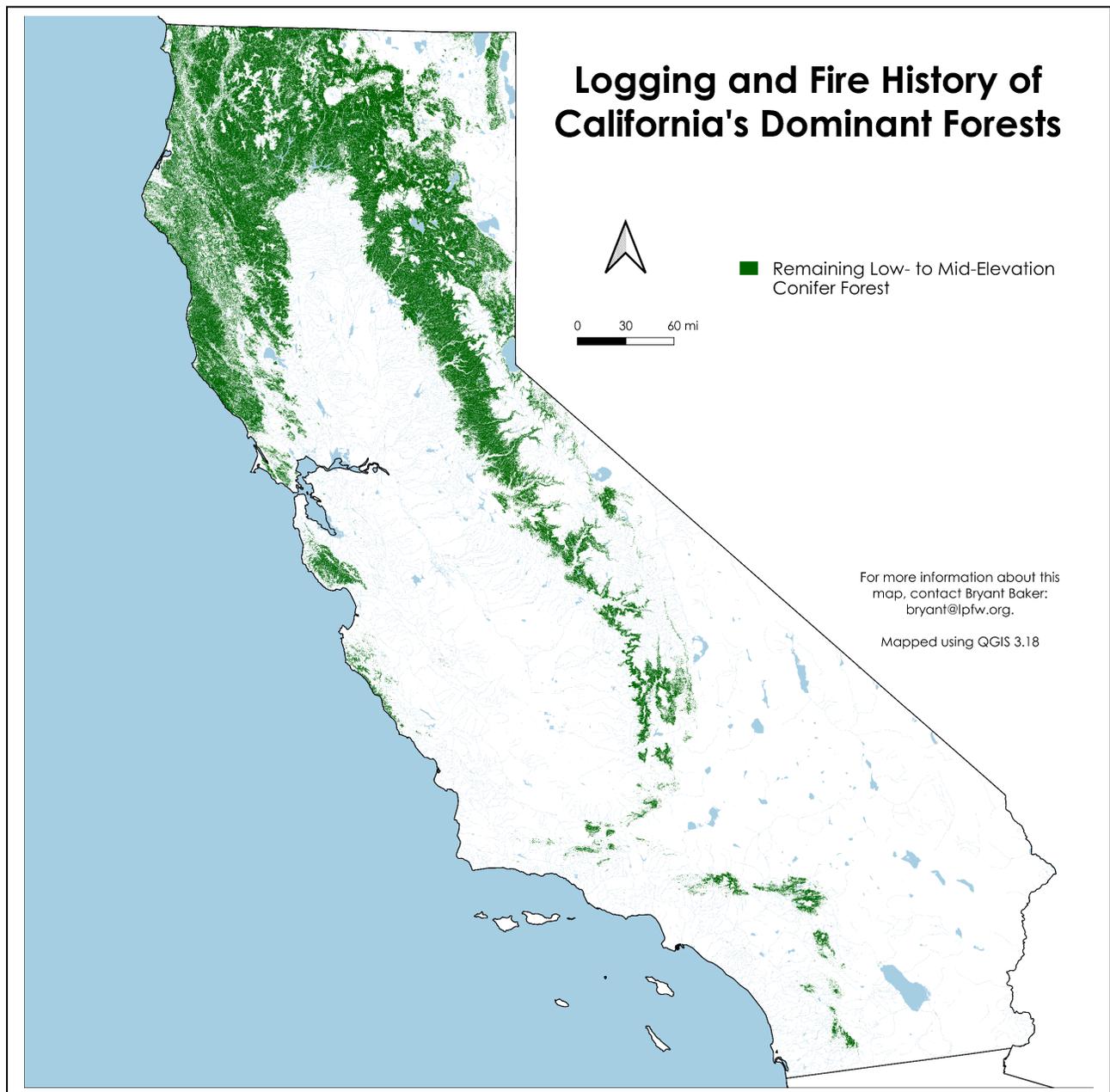


Figure 1A. Remaining low-to mid-elevation conifer forests in California. See Figure 1B for logging/fire impacts.
Map: Bryant Baker.

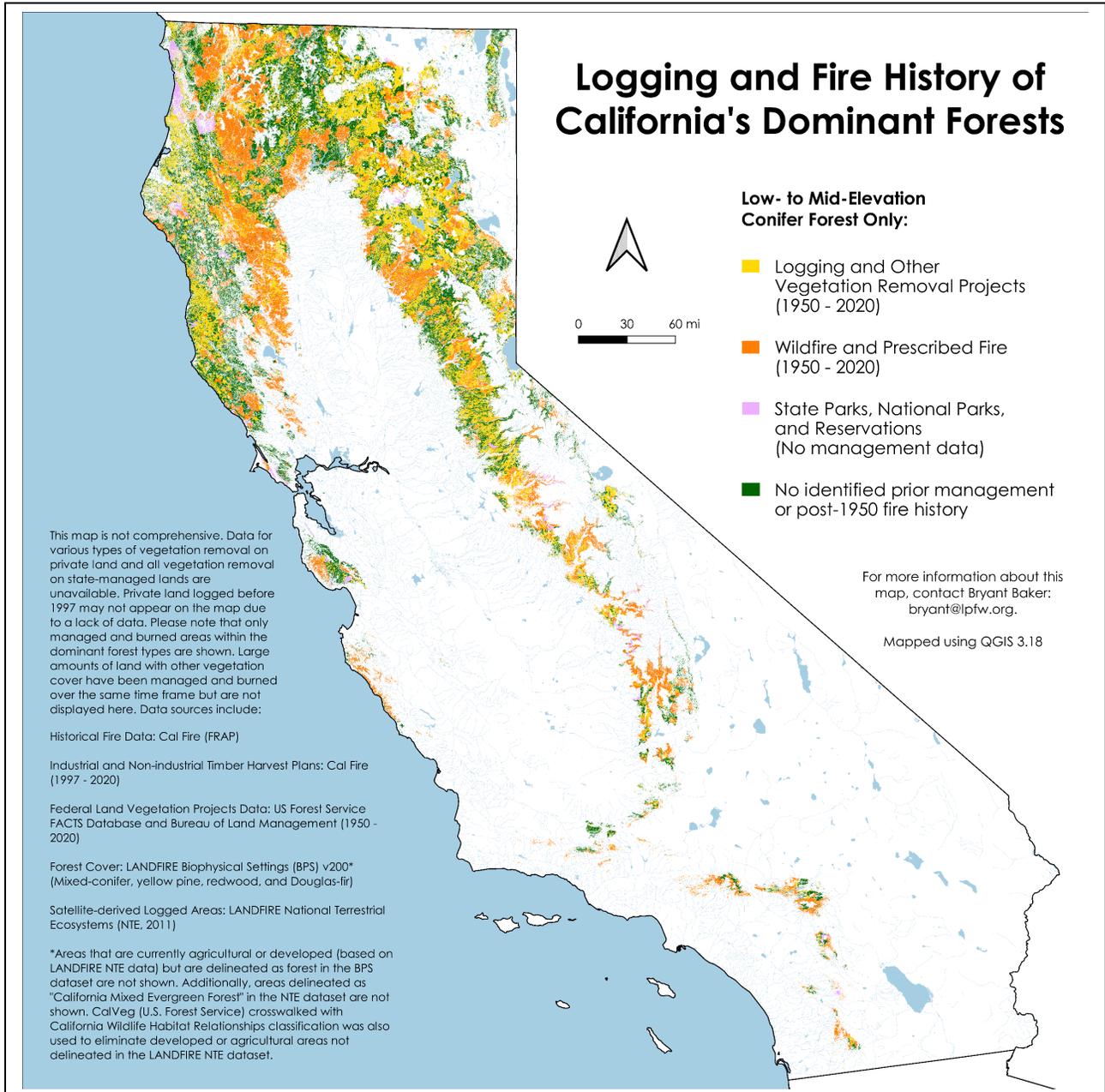


Figure 1B. Logging and fire history of California’s low- to mid-elevation forests in California. At least 63% of California’s remaining forests have either burned or have been logged since 1950. Map: Bryant Baker.

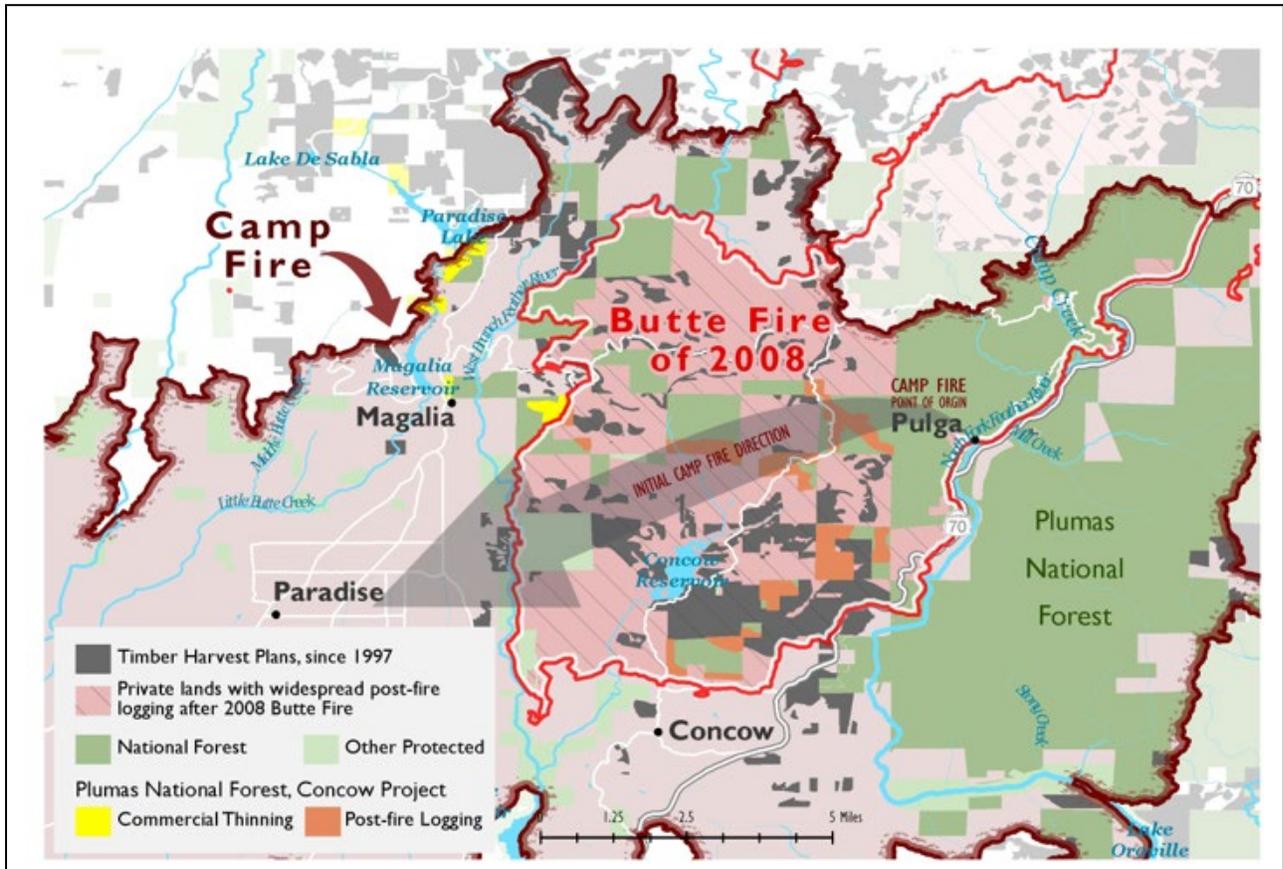


Figure 2. Before the embers hit the town of Paradise during the 2018 Camp Fire, the fire moved over 6 miles and 30,000 acres that had burned 10 years before (red outline). Much of this area had also been heavily logged post-fire and replanted with dense tree farms (pink). Along with the young, post-fire vegetation providing fine fuels, the areas damaged by logging created a perfect source of embers – the embers that were responsible for igniting Paradise. The area burned by the Camp Fire was not the overly dense forest characterized by the fire suppression narrative. It was in fact, a landscape heavily damaged and made more flammable by past logging practices. Map: John Muir Project.

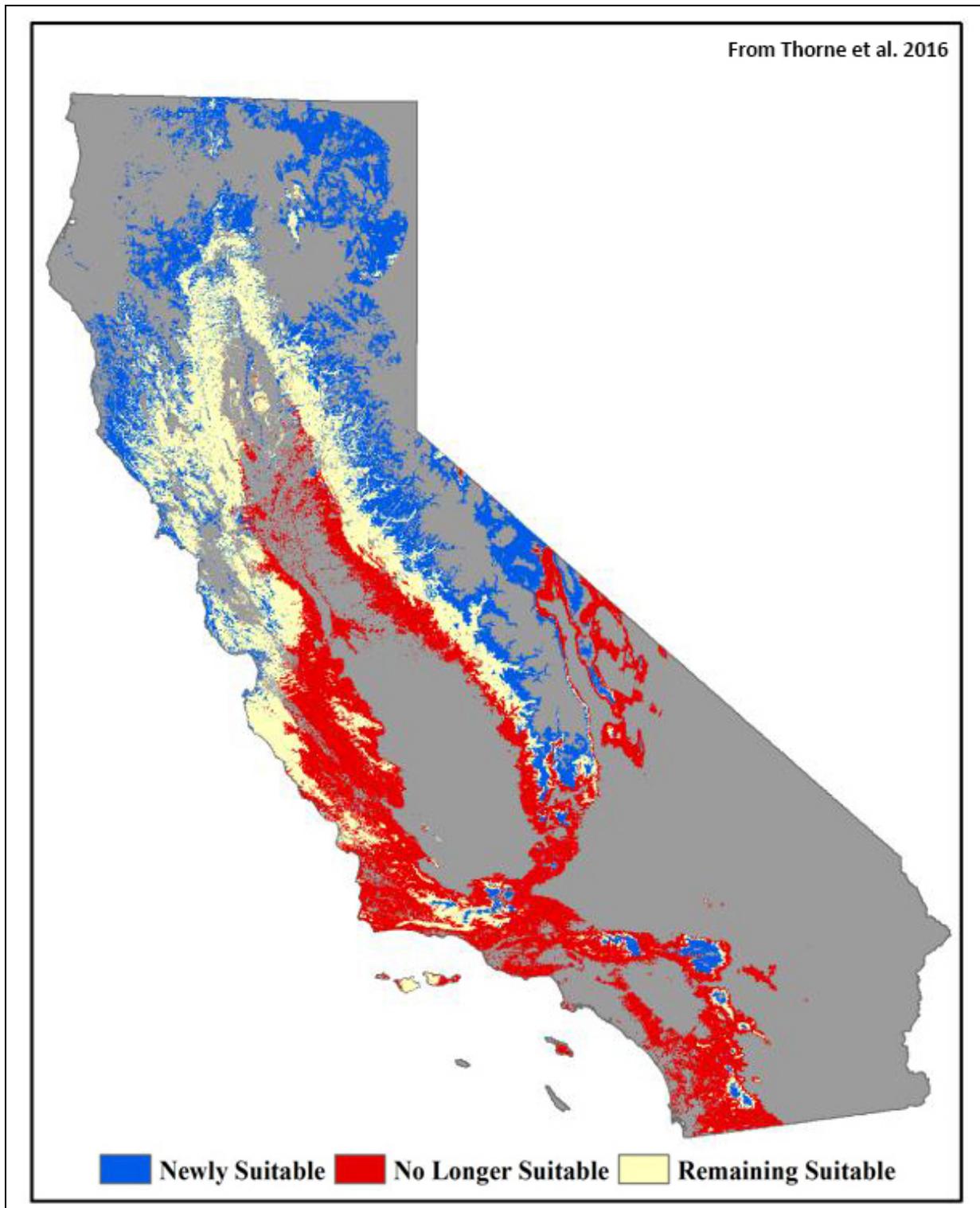


Figure 3. Under a future high emissions/hot and dry climate scenario for the time period 2070 - 2099, much of the area currently occupied by chaparral is predicted to be no longer be suitable for that plant community (shown in red). The likely replacement will be highly flammable, non-native weeds. From Thorne et al. 2016.

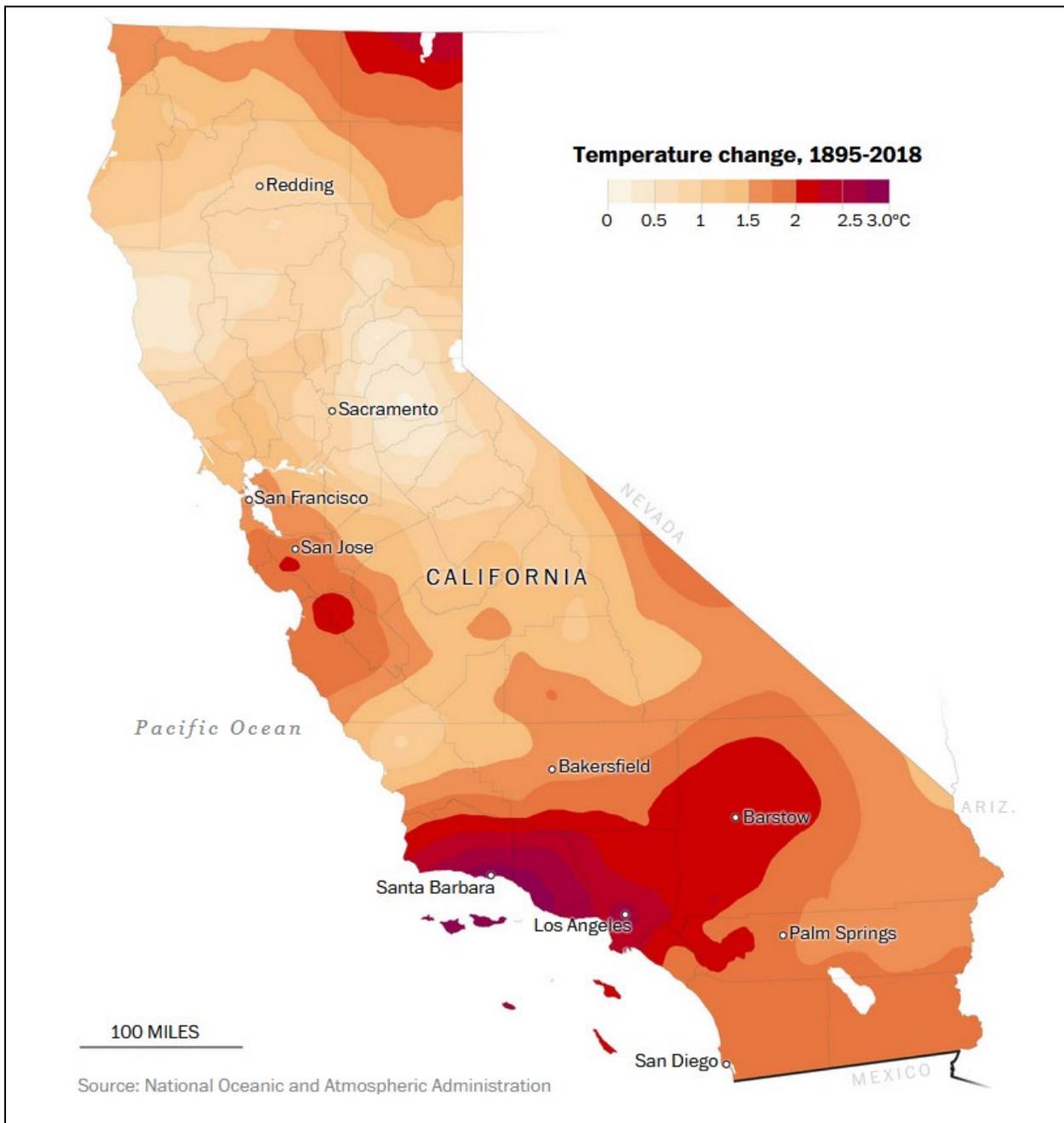


Figure 4. A warming climate means greater fire risk. Since 1895, the average temperature in Santa Barbara County has warmed by 2.3 degrees Celsius, according to The Washington Post's analysis. Neighboring Ventura County has heated up even more rapidly. With an average temperature increase of 2.6 degrees Celsius since preindustrial times, Ventura ranks as the fastest-warming county in the Lower 48 states. [From the Washington Post 2019.](#)



Figure 5 (above). California's most extensive ecosystem, the chaparral. Santa Barbara County.
Figure 6 (below). Post-fire forests are remarkably biodiverse, thriving habitats. Unfortunately, this habitat was logged, bulldozed, and replanted as it was deemed "unhealthy" by the USFS. Stanislaus National Forest.



Individual Signatories

Theresa Acerro
Leigh Adams
Allison Alberts
Beverly Alexander
Kimberly Alexander
Judy Alter
Sherrie Althouse
Stephen Amy
Larry Anderson
Morette Anderson
Paul Apelgren
Lynda Armbruster
John Armstrong
Nathan Avilla
Suzy Babcock
Stanley Baczynski
Victoria Balthazor
Erin Barca
Daniel Barger
Peggy Bartels
Katherine Barto
Katherine Barto
Kathleen Beck
Connie Beck
Gloria Beetle
Gwen Bell
Lisa Bellora
Norvelle Benevento
Jasper Benke
Karin Benson
Joel Berlin
Ava Bhavsar
Brooke Binkowski
Jenny Blaker
James Blauth
Josie Blue
Britannica Bobolinski
Ralph Bocchetti
Deniz Bolbol
Ernestine Bonn
Mackenzie Borau
William Preston Bowling
Tim Bray
Brien Brennan
Marie Brennan
Jorge Briceño
Richard Brody
Mary Brooks
Dana Brown
Shelly Browning
Lorraine Bubar

Rachel Burnap
Cynthia Buxton
Linde Buzard
Judith Cain
Patty Calderon
Jennifer Campbell
Meital Carmi
David Carr
Kimberly Carr
Clark Carr
Karla Carroll
Michael Casey
Mike Casey
Judith Cassis
Amelie Catheline
Wayne Chapman
Jeanne Chick
Lucy Clark
David Clarke
David Coleman
Kathleen Cook
Pamela Coon
Scott Cooper
Polly Cooper
Cynthia Cornelius
Christopher Crabtree
Hope Creature
John Crowley
Leah Culberg
Kevin Cummins
Jeanne Dancs Arthur
William Dane
Susan Davidson
Susan Davidson
Mary de Mahy
Joanna H Deane
Monider DeMars
Sandy DeSimone
Pietro di Girolamo
Morgan Dickson
Barbara Diederichs
Deborah Dobish
Samantha Dowdall Green
Mary Dreier
Victoria Dunch
Margaret Dunn
Sarah Dunn
Andrew Eastty
Noelle Eberz
Linda Espino
Diane Etchison

Mike Evans
Ryan Evans
Drew Fetton
Kelly Fine
Douglas Fisher
Judy Fishman
Theo Fitanides
Julie Ford
Janet Franklin
Royal Fraser
Royal Fraser
Alison Frichtl
Julianne Frizzell
Cara Furio
Jenny Gallego
Diane Gentile
Maureen Gerwig
Willard Gleeson
Sandra Glover
Steven Goetz
Theresa Goggin
Ruth Goldway
Ellen Golla
Julie Gonella
Alicia Gonzalez
Watson Gooch
Maxine Goodyear
Wade Graham
Natasha Granoff
Linley Green
Eileen Gregorovic
Ann Grodin
Larry Grondin
Carol Gross
Steve Gross
Maureen Gugerty
John Gutierrez
Jake Halsey
Nick Halsey
Kim Hamilton
Laurie Hannah
Jim Hanson
Steven Harbour
Larry Harper
Karen Harper
Norma J F Harrison
Jane Hartmann
Kathy Havert
Michael Hawk
Richard Hayden
Ross Heckmann

Jean Hegland
Adrienne Heinzelman
Keith Heinzerling
Rosalind Helfand
Brenda Hemsing
Heather Hendrickson
Chris Hendrickson
Kathlene Henry-Gorman
Bevan Herbekian
Yara Herrarte
Melissa Herrmann
Lawrence Herzog
Lori Hiers
Karen Hildebrand
Felicia Hill
Matthew Hiser
Julie Hocking
Christine Hoey
Claire Hoffman
Bruce Hollister
Hazel Hopper
Richard Horwath
Jeffrey Hubbard
Dennis Huckabay
Wesley Hudson
Sharon Hull
Alex Hunt
Judith Iam
Deborah Iannizzotto
Margaret Jacquemin
Lori Jirak
Lorie Johansen
Marilyn Johnson-Kozlow
Gene Joly
Steven Kafoure
John Kaiser
Jean Kaiwi
Jean Kaiwi
Henry Kantrowitz
Nikki Karpinski
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Douglas Kenning
Nancy Kenyon
Brian Kessler
Kerri King
Saran Kirschbaum
Matthew Kline
Gerald Knezevich
Patti Koger
Fred Kramer
Julie Kremkus
Wendy Krupnick
Susan Krzywicki

Leslie Kuhn
Alexander Kunz
Olivia Kuser
Elisa Lamont
Celeste Larson
Miles Lartch
Martha Lawrence
Tara Lee
Barbara Leighton
David Leitch
George Lewis
Amelia Lima
Michael Lindsey
Amy Lint
Stacy Lippincott
Cassandra Lista
Charles Little
Betsy Livingstone
Carolyn LoBuglio
Larry Loehner
Keith Lombardo
Julie Long Gallegos
Carolyn Losee
Tamar Lowell
James Lowery
Sidney Lynch
Nina Macdonald
Shaun MacDonald Hawke
Donna Mackiewicz
Matt Maguire
Thomas Majich
Victoria Manassero
Susan Maples
Susan Marchetti
Michael Marchiano
Viviane Marquez-Waller
Victoria Marshall
Shaloni Martinez
Charlene Mason Gallego
Sharyl Massey
Elizabeth M Mather
Sara Mattox
Mary McAllister
Sacha Mcrae
Michael McDermott
Marc McGinnes
Daniel McGinnis
Kathleen McNairnie
Anne McNeill
Emma Mederos
Vince Mendieta
Kristin Mercer
Jeri Mercer

Thomas Merchant
Richard Mercurio
Mylene Merlo
Cole Metzger
Margaret Meyncke
Robert Mihalik
Shea Millan
Michael Millan
Nancy Miller
David Miller
Kathryn Miller
Teresa Moore
Elsa Morris
Gerald Morris
Nancy Morse
Mark Mortensen
Lani Mulholland
Linda Murray
Kathy Musial
Andrew Nakamura
Torrey Neel
Pam Nelson
Judy Neuhauser
Stuart Niebel
Dale Noonkester
Henry Nowakowski
Leslie Nowakowski
Cory O'Gorman
Linda O'Brien
Debbie Ochs
Angela Ocone
Kristen Olafson
Debra O'Leary
Alonso Olvera-Gonzalez
Edward Omberg
Maria Ornelas
Theresa Ortega-Simpson
Frank Ortiz
Sarah-Jane Owen
Richard Padilla
Cynthia Papermaster
Linda Pardy
Linda Pardy
Tania Parker
Tara Parker-Essig
Jamie Parsley
Oren Patashnik
Dr Jack Paxton
Hill Penfold
Daniel Perreault
Griff Peters
Katrina Petersen
Mary Peterson

David Peterzell
Kirby Pierson
Shelley Plumb
Toni Pogue
Renata Pompelli
David Powdrell
Pauline Priest
Jennifer Radtkey
Kirk Raeber
Linda Raeber
Annie Ransom
Louis Rawlins
Christopher Reed
Cheryl Reiff
Megan Reinbold
Karen Reiter
Minna Riber
Michael Riber
Donald Richards
Andrea Richards
Tara Richel
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Don Rideout
Teri Rider
Russell Riello
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Lisa Salazar
Ruth Salter
Kiran Samuels
Andre Sanchez
Cristina Sandoval
Ariel Santa Maria
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Melba Slavin
Kenneth Slayen
Andrew Smisek
Trina Smith
Teri Smith
Tanya Smith
Maria Soto
Lisa Stanziano
Nan Serman
Kay Stewart
Mark Stratton
Robin Street-Morris
Julie Stromberg
Lorraine Suzuki
Tamara Tamburro
Zach Tanner
Debra Temple
Robert Thiele
Stephanie Thomas
Skyler Thomas
Timothy Thompson
Doug Thompson
Tim Thompson
Roger Tierney
Sara Timby
Kathryn Titi
Pam Toner
Ava Torre-Bueno
Jordan Tousignant
Chloe Van Loon
Betsy Vanleit
Jessica Varlet
Marilyn Vaughan
Susan Ventura
Judy Villablanca
Stephen Vodantis
Bev Von Dohre
Anne-Christine von Wetter
Kim Wagner
Hannah Walchak
Donna Walker
Elizabeth Wallace
David Waller
Julie Ward
Rihard Warkek

Gloria Warren
Lucy Warren
Anna Washington
Barry Wayne
Molly Weden
Joseph Weinstein
George Weiss
Cameron White
Roland Wilhelmy
Ron Wilson
Madison Wilson
Lisa Wilson
Kelly Wilson
Richard Wise
George Witter
Elizabeth Witter
Bryan Wold
Kirby Wolfe
Susan Wong
Don Wood
David Worley
Beth Wurzburg
David Younkman
Carolyn Yvellez
Jenny Zhou
Alice Ziesing