# The California Chaparral Institute

...the voice of the chaparral



August 31, 2008

Tom Oberbauer Department of Planning and Land Use County of San Diego 5201 Ruffin Road San Diego, CA 92123

Tom,

We have received and reviewed the third Draft of the County's Vegetation Management Report and have found it to be a significant improvement over the previous versions. Thank you for considering and addressing many of our concerns.

As per discussions during the FAST meeting on August 28, 2008 we have listed five changes for the final Draft. These have also been identified as "tracked changes" in the Draft itself.

# 1. Eliminate references to vegetation health unless specifically discussing forested ecosystems.

The phrase "vegetation health" is used throughout the document without definition (pages iii, 1, 5, 11, 12, 13, 18, 19, and 20). Using the term in such a way, especially when referring to chaparral, is problematic and implies knowledge we do not have. To avoid pejorative references to chaparral, we also suggest the elimination of the word "brush."

## 2. Emphasize the entire fire risk reduction equation.

We recommend changing the options listed on page iii in order to reflect the importance of dealing with the total fire environment.

#### 3. Avoid the concept of "mosaics."

We are grateful that the third draft has removed nearly all of the statements that promoted

the creation of mixed-aged mosaics on a landscape scale for the purpose of fire risk reduction. We recommend the removal of remaining references to mosaics and generalized "controlled burns" on pages 6, 8, 11, 12, 16, 17, 19, and 20. We believe the use of "strategically placed prescribed fire" would be much more descriptive and accurate.

#### 4. Provide references reflective of the research available.

If the County feels it is important to mention controversies over the region's fire regimes (page 3), it would be best to provide a list of references reflective of the research available. We have made suggestions in the Draft's reference section.

## 5. Eliminate references to fire adaptations.

The discussion of fire ecology is beyond the scope of this draft and may imply knowledge we do not have. We suggest these references be removed on pages 7 and 20.

Thank you again for allowing us to participate in the County's efforts to help reduce the threat of wildfire to both our communities and the natural environment.

Sincerely,

Richard W. Halsey

Director