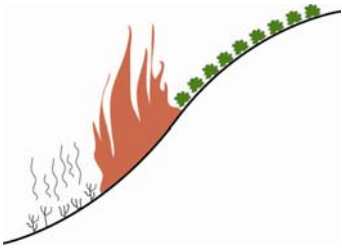


The California Chaparral Institute

...the voice of the chaparral



January 5, 2009

San Diego County Planning Commission
Attn: Cheryl Jones
5201 Ruffin Rd, Suite B
San Diego, CA 92123

Re: Vegetation Management Report

Dear Chairman Riess and Members of the Commission,

Thank you for becoming involved in the county's wildfire risk reduction efforts. Your attention to this important matter has already made a significant difference in improving the process.

The three most important points of consensus from the two county workshops on wildfire risk reduction were:

- 1. The county must address the entire fire risk equation.**
- 2. Wildland vegetation management alone will not be effective in reducing loss.**
- 3. The most effective way to reduce loss of life and property is by focusing on the wildland/urban interface, not out in wildland areas.**

Unfortunately, the December 23, 2008 draft of the county's Vegetation Management Report does not properly reflect these three points of consensus.

While an improvement, the current document demonstrates significant problems in how it deals with the content of previous drafts as well as the consensus developed by the workshop process. In many instances, the newly inserted workshop summary conflicts with the rest of the document.

Despite assurances to the contrary, the current draft document continues to imply that large scale vegetation treatments should be used on a county-wide basis. **This approach was NOT the consensus reached during the two county workshops.**

Alternative and ultimately more effective ways to reduce wildfire risk that *were* discussed during the workshops were either excluded or given only passing mention.

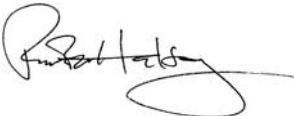
This is a great concern because it confirms our fears that regardless of what the workshop participants provided, the Department of Planning and Land Use (DPLU) would continue to ignore the need to address the entire fire risk equation. Instead, the Department continues its efforts to promote unwise fire and land management strategies in the backcountry at the expense of more effective ones where it matters most – along the wildland/urban interface. These strategies include:

- 1. Adopt the new California State Resource Code 4291** as the countywide standard for defensible space and how to view fire risk reduction at the wildland/urban interface.
- 2. Adopt the Fire Management Plan of the Santa Monica Mountains National Recreation Area** as a model for creating strategic fuel treatments.
- 3. Establish a “Go Early or Stay” fire education program** similar to ones being established in Ventura and Santa Barbara Counties.
- 4. Create and adequately fund a county-wide fire department** that has the capability of conducting inspections, enforcing fire codes, and fighting fires. The Orange County Fire Authority and recommendations made by the San Diego County Grand Jury and the San Diego Regional Fire Safety Forum provide excellent examples.
- 5. Adopt a county-wide fire safe community planning policy** that assists homeowners to retrofit unsafe homes, deal with urban fuels, and ensures new developments are not positioned within fire corridors.
- 6. Correct misconceptions about the role of fire in shrubland ecosystems, especially chaparral, in Multiple Species Conservation Plans (MSCP)** and other county planning documents.

We are hopeful you will help the Board of Supervisors understand that successful fire protection must address the entire fire risk equation.

We remain cautiously hopeful.

Sincerely,



Richard W. Halsey
Director

Recommendations

The following problem areas need to be rectified within the county's vegetation management report:

1. Points of consensus must be accurately described. Despite numerous efforts by the workshop facilitator to refocus the discussions on wildland vegetation, participants continually returned to the fundamental question we had hoped this process would address: what is the best way to protect life, property and natural resources from wildfire? During these discussions, consensus was reached on three important points:

- a. The county must address the entire fire risk equation.**
- b. Wildland vegetation management alone will not be effective in reducing loss.**
- c. The most effective way to reduce loss of life and property is by focusing on the wildland/urban interface, not out in wildland areas.**

The second point is mentioned on page 5 of the draft report as part of the workshop summary. The first and third points are not clearly articulated at all. None of these points are mentioned in the Executive Summary or the Potential Future Options list, both of which remain exclusively focused on wildland vegetation. This deficiency needs to be corrected.

There are also deficiencies in the report's stated consensus items.

Consensus item #2. There was no consensus that Mexico can serve as a historical reference point. I and several others indicated during the workshops that combined with the complexity of southern California's vegetation communities and future climate change, it is not particularly helpful to use such a comparison.

Consensus item #4. There was no consensus that "There is a limited knowledge base on the efficiency, environmental costs, or consequences of large-scale vegetation management actions." In fact, there is a significant amount of research indicating such actions "**are impractical, unnecessary, and probably not particularly effective**" in creating a strategic approach to fuel and fire management in chaparral (Conrad and Weise 1998). We continue to be baffled why the DPLU continues to ignore the scientific literature.

Immediately following this "limited knowledge" claim, the report states that our workshop group concluded this "should not stop management actions." We find the juxtaposition of these statements especially egregious because the cited paragraph implies that large-scale vegetation treatments should go ahead just as long as there is some kind of monitoring of impacts afterwards.

Of course we should not stop reasonable vegetation management actions to protect life and property. But the consensus of such management actions in no way included large-scale vegetation treatments, but rather limited “strategic” ones. The term strategic is frequently used in the report, but has not been defined. This will lead to unnecessary conflicts over interpretation in the future. We concur with the definition offered by the Endangered Habitat’s League and request that it be added to the report:

Within shrublands, “strategic fuel treatment” means creating spatially limited “fuel breaks” of low fuel volume in topographically advantageous locations where they can be helpful in providing access, serve as anchor points, and offer opportunities for back firing during fire suppression actions.

Consensus item #10. Contrary to what is described in this item, several participants did indeed offer ideas for planning models. The Santa Monica Mountains Fire Management Plan does NOT recommend using fire for “resource enhancement” for shrubland ecosystems. And the SMM fire plan has been around long enough to demonstrate that it is a workable model.

What is troublesome about the errors in #10 is that they are reflective of similar misinterpretations of scientific documents that occurred in the second draft of the county’s Vegetation Management Report (8/13/08). In response to those errors, representatives from the Santa Monica Mountains National Recreation Area and Dr. Scott Mensing wrote letters correcting the misinterpretations of their work. These letters were submitted to you earlier, but we have attached them again at the end of this document for your convenience.

This pattern of misinterpreting conclusions in scientific papers has led us to believe the author(s) of the current draft must be so wedded to the concept of large-scale vegetation management that they are unable to recognize contrary data.

2. Assurances made by Jeff Murphy concerning content and process need to be honored. Mr. Murphy made it very clear during the 11/20/08 meeting that the county is “not interested in changing the age class of vegetation,” and that the county “does not have a predetermined preference as to what to do.” Yet, “age-class,” “mosaics,” and large-scale vegetation treatments continue to be important components of the document. See examples on pages 11, 12, 22, 23, and 25. The report repeatedly makes the presumption that prescribed burns will eventually be used across the county (example pg. 14).

3. Workshop participant input needs to be honored. As requested by Tom Oberbauer, we submitted a letter to the county on 9/1/08 detailing agreed-upon changes to a previous draft during the August 28, 2008 FAST meeting. All but one of the more than thirty

changes listed in our letter were ignored. This pattern has been experienced by other contributors to the process.

4. The report must be science based and reflect the scientific documents provided. It appears that little or none of the scientific literature, answers to questionnaires, or other supplemental materials provided by the workshop participants have been used in writing the draft report. This is demonstrated by the following:

- The continual promotion of vegetation age-class fuel treatments (mosaics) despite the overwhelming scientific evidence demonstrating that this is not the most effective way to reduce fire risk. Please see the attached document, *“Resolving the Controversy: Why Large Fires in Southern California.”*
- The continual use of the term “vegetation health” in reference to non-forested ecosystems as a way to justify fuel treatments (see example on pg. 15). The dominant ecosystem in the county is chaparral. There is no scientific support for introducing more fire into this system as a way to improve its “health.”
- Ignoring or minimizing the fact that the chaparral ecosystem can be seriously compromised or eliminated by short fire return intervals and vegetation treatments. We believe such an assumption may be driven by the county’s desire to ignore negative impacts of its vegetation management strategy.
- Stating that “invading chaparral shrubs” must be removed in Cuyamaca in order to restore the forest (pg. 25). Such a perspective indicates a serious ignorance of ecological succession. The so-called “invading shrubs” are critical to restoring the soil’s nitrogen balance. Removing them will negatively impact recovery. Cited literature is attached.
- The report’s reference list is not representative of the scientific literature. A wealth of material was provided to the county by the workshop participants. It should be cited to allow those interested in cross checking the conclusions of the report with all the key papers.

5. The report needs to include discussion points involving issues the entire fire risk equation. Since the intent of this process is to develop methods to protect lives, property, and natural resources from wildfire, it makes sense for the county to include any reasonable suggestion that can help reach this goal. The following were suggested during the workshop process.

- The need for a functioning, properly funded county fire protection system (be it an official county fire department or something different).

- Proposition 172 money should be considered to fund fire protection services and monitoring fuel treatment results/impacts.
- Many individuals have expressed anger over the evacuation process during the 2007 firestorm and have indicated they intend to ignore the order next time. As a consequence, the county needs to recognize that there may be a large number of people staying behind to defend their own homes during the next incident and makes plans now to deal with it. The Ventura County model of “Go Early or Stay” approach is one that needs to be considered.
- Since no one representing watershed concerns was invited to the workshop process, it is critical that such input is solicited. Any type of vegetation management, be it prescribed burning or some other technique, will have significant impacts on the region’s watershed. We recommend Jeffrey Pasek, San Diego Water Department’s Watershed Manager.

Attachments

Resolving the Controversy: Why Large Fires in Southern California.

Letters from the Santa Monica Mountain National Recreation Area and Dr. Scott Mensing.

References concerning the importance of *Ceanothus* shrubs to ecosystem recover (below).

Binkley, D., K. Cromack Jr., R.L. Fredriksen. 1982. Nitrogen accretion and availability in some snowbrush ecosystems. *Forest Science* 28(4): 720B724.

Conard, S.G., A.E. Jaramillo, K. Cromack Jr., S. Rose, comps. 1985. The role of the genus *Ceanothus* in western forest ecosystems. Gen. Tech. Rep. PNW-182. Portland, OR: USDA Forest Service, Pacific Northwest Forest and Range Experiment Station. 72 p.

Delwiche, C.C., P.J. Zinke, C.M. Johnson. 1965. Nitrogen fixation by *Ceanothus*. *Plant Physiology* 40(6): 1045B1047.

Hellmers, H., J.M. Kelleher. 1959. *Ceanothus leucodermis* and soil nitrogen in southern California mountains. *Forest Science* 5: 275B278.

Youngberg, C.T., A.G. Wollum II, W. Scott. 1979. *Ceanothus* in Douglas-fir clearcuts: nitrogen accretion and impact on regeneration. In: Symbiotic nitrogen fixation in the management of temperate forests conference: proceedings of the symposium; 1979 April 2B5; Corvallis, OR. Corvallis: Oregon State University. 224B233.