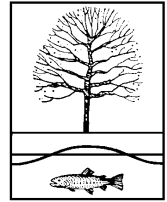


SANTA BARBARA URBAN CREEKS COUNCIL

P.O. Box 1467, Santa Barbara, CA 93102 (805) 968-3000



March 10, 2011

Santa Barbara County
Board of Supervisors
105 East Anapamu St.
Santa Barbara, Ca 93101

Transmitted via email [sbcob@co.santa-](mailto:sbcob@co.santa-barbara.ca.us)

barbara.ca.us

Re: County Brushing Ordinance Amendments

Dear County Supervisors,

The Santa Barbara Urban Creeks Council is a 501(c)3 non profit organization that has advocated for over 20 years for sound watershed management practices across the south coast. Over that period of time we have been the voice for over 3000 families and members who share a common vision for safety, clean water, and biological productivity within the watersheds of the region.

The watersheds that define topography and that support ecosystems across the front country of the Santa Ynez range are important for protecting our water supplies, reducing flooding, providing scenic views and maintaining fish and wildlife species.

Native plants that have evolved through fire cycle adaptation over thousands of years are well suited for the soils, steep terrain, rainfall regime, and climate of the region. The root systems of native vegetation such as ceonothus, toyon, chamise, coast live oak, coyote brush, giant rye grass, and many other plants serve as a soil binding matrix that is essential to preventing erosion on steep slopes. When these plants are removed, chaparral can be type-converted to non-native weed lands, increasing fire hazards and decreasing community values. Non-native annual thistles and other weeds are already invading areas cleared in recent years, suppressing natives and creating dry kindling that increases fire risks to chaparral.

These watersheds are directly impacted by development, road construction, human caused fires, and other disturbances. Historically there have been many losses associated with wildfire where human improvements, homes and communities have been placed in harm's way, in proximity to fuel beds across the south coast. Most recently the Tea, Gap, and Jesusita fires have motivated property owners to take well-intentioned although perhaps inappropriate measures to address the realities that are associated with human presence within the fire prone chaparral and other fuels of the southern Santa

Ynez slopes.

Our concern is that destruction of native fuels and disturbance of soils in the effort to influence fire behavior may exacerbate erosion problems on the slopes and in the foothills above our communities and may cause debris mobilization that will increase flooding risks downstream within urbanized areas. Loss of habitat and degradation of valuable natural resources are also a concern of our membership as is impairment of water quality. When slopes are denuded, water quality is diminished by heavy mobilization of silt into creeks and by loss of summer base flow in creeks resulting from acceleration of runoff and loss of absorption into groundwater stores.

Where native vegetation has been burned by recent fire, it will return within a few years. Native vegetation survives fires and must be allowed to remain undisturbed wherever possible.

UCC urges the County to enforce and amend ordinances to protect chaparral habitats and our watersheds. UCC does not oppose all chaparral clearing but believes the County should subject all clearings to environmental impact analysis, mitigation of impacts, and consideration of alternatives. We support fire protection measures such as strict enforcement and assistance with maintaining defensible space, and assistance with retrofitting homes to be fire-resistant. These are effective and efficient alternatives to environmentally destructive wildland clearing. We also support sound land use zoning that discourages development in fire prone area.

When alternatives such as maintaining defensible space would not feasibly protect existing development, and where comprehensive fire modeling and fuel bed analysis done by qualified specialists shows that larger-scale clearing is necessary, then the County should subject proposed clearings to a regular public review process as would be done for any type of development which proposes removal of significant habitats.

Our chaparral supports numerous rare species and is an Environmentally Sensitive Habitat Area (ESHA), although not always currently mapped as such. It is a rare habitat on a global scale and is unique and ecologically important. Environmental review must consider the biological values of chaparral before any substantial clearing is undertaken. Our streams and riparian zones support steelhead, red-legged frogs, 2-striped garter snakes, western pond turtles and many other species which are adversely impacted by the type of clearing being undertaken in some locations. Environmental analysis must consider impacts to these habitats and must consider other downstream impact potentials including debris mobilization, siltation and flooding.

Work must be performed by properly trained and competent crews who understand the environmental consequences of their actions. Best Management Practices (BMPs) must be carefully selected and implemented for any work that is allowed. Fuel modification and creation of defensible space is more than just mowing down or bulldozing fuels that are perceived to be a threat. Employment of effective and non harmful methods must be insisted on.

Focus should remain on maintaining defensible space around homes and retrofitting existing homes to be fire-safe. Where larger-scale removal of chaparral habitat is approved, if necessary after a public environmental review process, strict protections should be in place to minimize impacts. Loss of habitat must be mitigated.

Stabilization of slopes is essential as part of proper management of fuel beds, wherever it is necessary to modify fuels for fire safety. Creation of a fuel mosaic, or vegetated islands and better spacing of fuel classes may be advised in some instances and would minimize both fire risk and environmental damage. Work must be planned to benefit the topography, not just for fire safety but to properly manage all other risks as well. Work done on fragile slopes is best done by hand crews, and tailored for each situation. If the work is planned and implemented properly with these important points in mind, use of heavy equipment, arbitrary destruction of native vegetation and damage to slopes will not be necessary.

We respectfully urge that you take steps to ensure that fuel modifications other than maintenance of defensible space be limited to only those necessary and only if determined to be necessary by evaluating all risks and impacts. If approved, such projects should be carefully planned to minimize unintended consequences. Crews must be properly trained and equipped, and must employ methodologies that do not destabilize soils or degrade habitat.

We recognize the importance of fire safety and encourage property owners to protect their homes and communities but we don't think it is wise to take actions that carry risk of unintended and harmful impacts. We request that you amend the Brushing Ordinance to make it enforceable. Additionally we request that you direct staff to bring back additional amendments to better protect our watersheds from chaparral clear-cuts.

In the interest of improved fire safety through sound resource management, I thank you for considering the concerns of our many members.

Sincerely,

/s/

Eddie Harris
President
Santa Barbara Urban Creeks Council