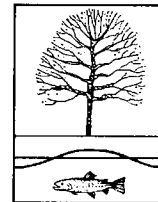


SANTA BARBARA URBAN CREEKS COUNCIL

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October 7, 2015

Santa Barbara County
Board of Supervisors
105 E. Anapamu Street
Santa Barbara, CA 93101

Re: Support for EGVCP and Response to Mission Canyon Association letter dated September 5, 2015

Honorable Chair and Supervisors,

This letter responds to the Mission Canyon Association (“MCA”) letter regarding the Eastern Goleta Valley Community Plan (“EGVCP”) dated 5 September, 2015.

The MCA letter states that the Environmental Defense Center “has inserted a request to ‘designate and protect chaparral as ‘environmentally sensitive habitat’” (“ESH”). However, it is important to note that the EIR and the EIR consultants, including biologists knowledgeable about Santa Barbara County habitats, independently and objectively concluded that chaparral qualifies as an ESH and must be designated an ESH in order to substantially lessen the EGVCP’s significant environmental impacts.

In fact, the EIR, EIR consultants, local biologists and County staff have identified a significant, unavoidable “Class I” impact in the Plan related to vegetation removal – including chaparral - in rural areas. Under CEQA, an EIR must include feasible measures which avoid or mitigate significant adverse impacts.¹ *The EIR, consultants, and staff have identified a feasible mitigation for this impact: designating four types of chaparral as ESH.* This measure will not entirely avoid the EIR’s Class I impact because ESH removals will still be allowed, but this measure will substantially lessen the impact as required by CEQA.

¹ CEQA Guidelines Section 15126.4(a)(1).

The MCA letter also states that the County should “provide for community defensible space”. It is important to note that the EGVCP provides for community defensible space projects. Such projects would be allowed. Moreover, the EGVCP appears to help facilitate such projects by exempting defensible space from between 100 to up to 300 feet around homes and by extension around communities (i.e., 100 - 300 feet around each of a community’s perimeter homes). If approved, *the exemption will make it easier to plan and implement individual and community defensible space projects*. The County Fire Department has stated that the Plan, along with the brand new proposed 100-300-foot exemption for defensible space, *will not conflict with the Fire Department’s mission*.

Moreover, if a Community Wildfire Protection Plan (CWPP) is adopted for the Plan area (something many stakeholders and County Fire support), this would make it more likely that the Fire Department will lead community defensible space projects, making such projects fully exempt from ESH protections.

The MCA letter recommends addressing community defensible space through the Safety Element update. The Safety Element is coming back to the Board of Supervisors to be updated. The Safety Element is an additional planning tool through which to address fire safety issues such as community defensible space projects; however, it is also *important to retain the proposed defensible space exemption in the EGVCP to facilitate individual and community defensible space projects for communities such as Painted Cave*. When the Safety Element does come before the Board, it may provide a good opportunity to analyze similar needs that might exist within the County, and to benefit from Co. Fire Dept. leadership and support for a CWPP.

The MCA letter grossly misstates the effect of ESH on the Fire Department, stating “An ESH designation for chaparral burdens the fire department with expensive and cumbersome CEQA requirements.” County Fire recommended and P&D and EDC agreed with new language for a larger defensible space exemption. Given this exemption, County Fire indicated that designating chaparral as ESH “will not conflict with the Fire Department’s mission.” Moreover, *the Fire Department is and will remain entirely exempt from ESH regulations*. In addition, the Fire Department is already subject to CEQA and ESH designation has no effect on that.

The MCA letter fails to acknowledge the proposed exemptions for defensible space projects, for County Fire, CalFire and USFS projects, or the additional exemption for each property owner to remove up to 5,000 square feet of ESH.

Homeowners and communities will enjoy the benefit of this brand new defensible space exemption. They will be able to clear as much ESH around homes as County Fire believes is needed for public and firefighter safety – out to 300 feet which is a substantial increase from P&D’s proposed 100 feet – and such clearing will now be exempt from ESH rules.

The MCA letter states that “grass is a more flammable fuel” than chaparral and that flammability “equates to ignitability.” This is fairly accurate. Grasses and invasive weeds like star thistle that often replace repeatedly cleared areas of chaparral are annuals and dry out 100% each summer. They are more ignitable. Research shows that many chaparral fires begin in dry grassy

or weedy areas and are quickly carried into chaparral. Many of California's largest brush fires began as grass fires along roads and in other areas where chaparral had been removed. (Casey Zak, C., James Urban, J., Fernandez-Pello, C. 2015. Characterizing the Flaming Ignition of Cellulose Fuel Beds by Hot Steel Spheres," *Special Issue of Combustion Science and Technology: Papers from the 24th ICDERS*) One of the common denominators for wildfire fatalities and near-fatalities is fire which occurs in light fuels including grass, herbs and light brush. (Mangan, D. 2007. Wildland Firefighter Fatalities in the United States: 1990-2006. PMS 841. NWCG Safety and Health Working Team). By better protecting chaparral and thereby more effectively preventing the spread of invasive annual weeds and grasses, our community can reduce the fire ignition risk.

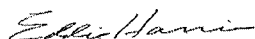
The MCA letter acknowledges that chaparral is an important public resource "we all cherish." Unfortunately chaparral receives essentially no protection in the Goleta Plan area and is being removed without notice, review or mitigation. By including moderate protections for chaparral – a currently threatened but unprotected public watershed resource – and by including the exemptions for the Fire Department and for defensible space, the Plan will increase both fire safety and wildlife habitat conservation.

Chaparral also protects people from erosion, landslides and flooding which are increased when deep-rooted vegetation is removed from the steep slopes above our communities. Chaparral helps infiltrate what little rainfall we get into our groundwater basins.

The MCA letter recommends that the chaparral protection be addressed on a countywide basis. However, community plans are developed by community members in that area to respond to issues that arise in their neighborhoods and to serve their local communities. Approaches to planning issues may differ amongst communities. Community planning is an effective approach to addressing local issues, such as community fire safety, and protection of chaparral in the Goleta Plan area, where clear-cuts have greatly increased in recent years.

In closing, the MCA letter contains significant inaccuracies and misrepresents the effect of the EGVCP on fire safety. It fails to acknowledge the substantial defensible space exemption proposed by County Fire, and other ESH exemptions. Mission Canyon already has a community plan that was developed by that community to reflect that community's interests and priorities. Goleta community members have worked for over 7 years to bring this balanced plan to fruition. The Board should respect the long, involved community planning process and the incredible work by many stakeholders and by County Fire to create a plan that maximizes fire safety and conservation. We urge the Board to support the EGVCP and its new exemptions for fire safety.

Sincerely,



Eddie Harris
SBUCC Board President
Retired County Firefighter