



CALIFORNIA  
NATIVE PLANT SOCIETY

October 1, 2018

Clerk of the Board of Supervisors  
105 E. Anapamu Street, Suite 407  
Santa Barbara, CA 93101

Submitted electronically to: [sbcob@co.santa-barbara.ca.us](mailto:sbcob@co.santa-barbara.ca.us)

Dear Santa Barbara County Board of Supervisors,

Thank you very much for the opportunity to comment on the recommendations on Fuels Management and Community Defensible Space in Santa Barbara County. We recognize that these recommendations are being considered an administrative action and do not require project-level California Environmental Quality Act (CEQA) review. However, we are concerned that these recommendations, when applied to individual fuel management projects, may have significant and adverse environmental impacts.

The California Native Plant Society ("CNPS") is a non-profit environmental organization with more than 10,000 members in 35 Chapters across California and Baja California, MX. CNPS' mission is to protect California's native plant heritage and preserve it for future generations through the application of science, research, education, and conservation. In line with our mission, we recommend that Santa Barbara County adopts fuel management policies that incorporate current scientific research, and minimize impacts to native habitats. The county should also continue to require project-level CEQA review for all fuel management activities.

The information provided in advance of the Board of Supervisors meeting on October 2, 2018 is problematic in several regards. First, the Santa Barbara County Fire Department advocates for the use of prescribed fire on 500-1000 acres of State Responsibility Area (SRA) land on an annual basis. Given that much of the SRA land in the county consists of chaparral and coastal sage scrub habitats we are very concerned with this proposal. There is virtually no science to support the use of prescribed fire for fire risk reduction in chaparral and coastal sage scrub habitats. The county needs to provide justification on how this proposal will reduce fire risk. Additionally, ample evidence indicates that actions such as these promote type conversion to more flammable non-native grasslands. In particular, new legislation, SB 1260, requires CalFire to show that the proposed uses of prescribed fire in chaparral and coastal sage scrub habitats will not lead to type conversion.

Second, we are especially concerned with the proposed use of prescribed herbivory, including grazing by goats, to reduce fuel loads. As has been shown in many habitats around the world, grazing by introduced herbivores can have dramatic, adverse impacts on native habitats and sensitive species. We encourage the county to prove that the use of prescribed herbivory will not have a significant negative impact on sensitive habitats and species.

Third, we question the construction of a vast network of roads and fuel breaks as a means to control wildfires. While we acknowledge that fuel breaks and fire roads can provide important access points for first responders, these actions have the potential to cause adverse environmental impacts, including the promotion of erosion and the spread of invasive plants. In Santa Barbara County, and many other locations in California, the most destructive fires occur during seasonal, high wind events. As evidence of this, wind-driven wildfires routinely jump multi-lane highways. We encourage the county to analyze the utility of new fuel breaks along with their potential environmental impacts.

Lastly, we encourage the county to implement planning policies that limit the risk of fire to infrastructure in the wildland urban interface (WUI). Specifically, the county should deny all new housing projects that are located in areas that are designated by CalFire as either high or very high fire severity zones. We also encourage the county to mandate that homeowners in the WUI take actions to protect their homes and properties from wildfires. This includes, but is not limited to, the thinning of vegetation within 100 feet of buildings and housing structure modifications that limit ignition probability. Once again, thank you very much for this opportunity, and please feel free to contact me with any questions. Sincerely,

Nicholas Jensen, PhD, Southern California Conservation Analyst

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