





From: Carla Mena <carla@lpfw.org>
Sent: Monday, July 10, 2023 3:18 PM

To: sbcob

Subject: Agenda Item: 23-00659 Public Comment

Attachments: 20230711_Agenda Item 23-00659 Support Seismic Safety and Safety Element of the

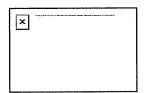
Comprehensive Plan Public Comment Letter _CM (1).pdf

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Greetings,

Attached please find a public comment letter for agenda item 23-00659 the County of Santa Barbara Seismic Safety and Safety Element (Safety Element) of the Comprehensive Plan.

Sincerely, Carla Mena



Carla Mena M.P.P.
Director of Policy & Legislative Affairs

Los Padres ForestWatch Office: 805-617-4610 ext. 5 Direct: 805-770-8692 Website: forestwatch.org

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Protecting the Los Padres National Forest, the Carrizo Plain National Monument, and other public lands along California's Central Coast

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The Santa Barbara County Board of Supervisors 105 EAST ANAPAMU STREET, SANTA BARBARA

Sent via email sbcob@countyofsb.org

Re: Agenda Item 23-00659 Seismic Safety and Safety Element of the Comprehensive Plan: Support Wildfire Policy Update

Dear Chair Das Williams and Members of the Board,

Los Padres ForestWatch hereby submits this comment letter in support of updating the Seismic Safety and Safety Element of the Comprehensive Plan: Wildfire Policy. We request that our letter be formally incorporated into the record and considered.

ForestWatch has served as a powerful advocate for the wildlife and wild places across our region. Decades of fire science and experience have demonstrated that the best way to protect our communities from wildfire is to focus from the home outward. Programs that encourage structural retrofits and defensible space provide the most effective way to reduce wildfire risk in local communities.

We generally support the Public Resource Code 4291 that requires all structures on State Responsibility Area (SRA) lands to maintain 100 feet of defensible space clearance. Studies have shown that a tiered approach, one that includes removing all flammable materials within five feet of a structure, removing 40% of woody vegetation adjacent to structures between five and 60 feet out, and ensuring that other vegetation does not overhang or touch structures, is the best recipe for defensible space in most situations.

With respect to fuel breaks, we support the County of Santa Barbara's decision to halt the fuel break program due to environmental concerns. Fuel breaks typically become dominated by non-native, invasive plants such as highly flammable cheatgrass, wild oats, and black mustard. Wildfires such as the 2019 Cave Fire above Santa Barbara can even start in fuel breaks and quickly move into adjacent, intact chaparral or other wildland vegetation. Moreover, remote fuel breaks are relatively ineffective at slowing or stopping wildfires driven by

extreme winds (e.g. sundowner winds), which are the types of fires that put communities most at risk.

As Santa Barbara County is dominated by chaparral, coastal sage scrub, and hardy coast live oak woodlands in the mountains and foothills as well as grasslands in the valleys, there is little need for post-fire restoration such as seeding. Most plant species in the chaparral and coastal sage scrub are capable of resprouting after being intensely burned or they have seeds that germinate readily in response to various fire effects. Coast live oak is one of the most fire-resistant tree species in the county as mature individuals can basally or epicormically resprout after their entire canopy is consumed. And grasslands quickly re-establish after fire, though most of these areas in Santa Barbara County are dominated by non-native species and more work should be done to determine whether such ecosystems can be effectively restored to a native grass- and forb-dominated state. There will always be short-term risk of flooding, mud slides, and debris flows after large wildfires, but mitigation should be focused on alert and evacuation systems in vulnerable communities.

It is important to note that the vast majority of wildfires in our region are human-caused, and some of the largest fires are started by faulty electrical transmission equipment. Mandatory regular maintenance and inspections are necessary to reduce utility-caused ignitions, and undergrounding of certain transmission lines may be a worthwhile investment when compared to the environmental, economic, and human costs of fighting fires. This should be reflected in the updated Seismic Safety and Safety Element of the Comprehensive Plan Wildfire Policy.

For these reasons, we respectfully urge the Board of Supervisors to update the Seismic Safety and Safety Element of the Comprehensive Plan to address current wildfire policy needs to properly protect the residents, community members, and the environment.

Sincerely,

Carla Mena, M.P.P

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Director of Policy and Legislative Affairs

Los Padres ForestWatch