



July 29, 2011

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

Re: Mission Canyon CWPP & Santa Barbara CWPP Development Process

Dear Chair Gray and Supervisors:

This letter is sent by the Environmental Defense Center (EDC) on behalf of the Santa Barbara Urban Creeks Council (UCC) in support of the Mission Canyon Community Wildfire Protection Plan (CWPP) and CWPP Development Process. EDC protects and enhances the environment through education, advocacy and, when necessary, legal action. UCC encourages the preservation, protection, and restoration of natural and urban streams in Santa Barbara County.

I. Mission Canyon CWPP

We are writing to encourage the Board to approve the CWPP, including its conservation recommendations, in order to establish a framework for reducing fire hazards while implementing measures to protect the important ecological values of Mission Canyon. Clearing vegetation for fire hazard mitigation is essential for fire safety, yet can result in erosion, sedimentation, invasion by ignitable non-native weeds, reduced groundwater recharge and reduced stream flows in creeks which support federally endangered steelhead. Therefore the conservation recommendations are important components of the CWPP, and the CWPP should serve as a model for all future CWPPs in the County.

EDC and UCC greatly appreciate the Mission Canyon Association's (MCA) cooperation and careful consideration of our comments when developing the CWPP and conservation measures. The draft CWPP included several conservation recommendations even before the MCA requested our input this spring. We offered suggestions to help the MCA enhance some of these recommendations.

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Chair Joni Gray and SB County Board of Supervisors re Mission Canyon CWPP & CWPP Template

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We understand that these recommendations are not required mitigation measures and that approval of the CWPP does not trigger CEQA. We note that some future projects will be exempt from CEQA (e.g., defensible space), and that projects under 5 acres are exempt from brushing permits pursuant to County Code Chapter 9A-6. Larger projects which require permits trigger CEQA. Future CEQA processes will be important for minimizing the incidental impacts of important fuel management projects which are not exempt.

CWPP Development Process

The Board should approve the CWPP Development Process which includes reference to conservation recommendations requested by EDC. With regards to conservation recommendations, the Board need only look at the Mission Canyon CWPP as a good example. All CWPPs in the County should follow this template and include conservation recommendations in order to ensure that environmental issues are considered in (1) the development of CWPPs and (2) implementation of important vegetation management projects needed to protect people and property from wildfires.

Thank you for your attention to these comments.

Sincerely,



Brian Trautwein,
Environmental Analyst

cc: Santa Barbara Urban Creeks Council