

November 1, 2016

Honorable Peter Adam, Chair  
Santa Barbara County Board of Supervisors  
105 East Anapamu Street  
Santa Barbara, California 93101

Subject: Comment on the Gaviota Coast Plan

Dear Chair Adam,

The mission of the Santa Barbara County Fire Safe Council is to unify public and private organizations to educate, motivate and coordinate the South Coast Community to minimize losses associated with wildfires. We serve the community by 1) educating homeowners and residents in fire-prone areas how to minimize wildfire losses through the use of proper building materials, landscaping techniques and brush clearance; 2) developing cooperating relationships between public and private organizations to coordinate pre-wildfire planning; 3) developing cooperative relationships between local fire agencies to establish common wildland fire prevention goals and policies; and 4) becoming financially independent through in-kind donations and financial contributions.

The Santa Barbara County Fire Safe Council (Fire Safe Council) believes that the Gaviota Coast Plan could better recognize and address the threat associated with wildfires in the Gaviota region, where two notable wildfires (Sherpa and Canyon) have occurred within and adjacent to the Gaviota Plan Area this year.

The Santa Barbara County Fire Safe Council has reviewed the Gaviota Coast Plan, the Final EIR and its associated Ordinance Amendments. We respectfully submit the following comments on several important issues associated with Public Services and Fire Hazards.

The Fire Safe Council appreciates the proposed policies (Policy AG-1.H and Policy AG-3.A) in the Plan that support practical rangeland management techniques to reduce wildfire fuel loads. However, certain Ordinance language designates a broad range of vegetation and associated vegetative alliances as environmentally sensitive habitat (ESHA). This appears to add new levels of protection that would require permits if these rangeland management techniques that are currently utilized by landowners to protect their structures and agricultural resources on their property continue.

Specifically, the Environmentally Sensitive Habitat Area Overlay Zone (Ordinance 35.28.100) proposes an ESHA Overlay that limits vegetation clearing to a 300 foot perimeter from a structure and only with the approval by the Fire Department.

The Fire Safe Council understands that this Ordinance language was adopted from earlier community plans for Goleta and Toro Canyon. However, given the physical terrain of the Gaviota Plan Area and the spread out nature of the development of the Plan Area (vs. the Goleta Plan or Toro Canyon Plan), the Fire Safe Council believes that the determination of defensible space should be concluded by the Fire Department and not limited to an arbitrary distance.

The Fire Safe Council respectfully submits the following recommended language to Ordinance Section 35.28.100.B.4.a which would give the Fire Department the ability to direct vegetation removal or fuel modification based on a safety zone calculation conducted on the subject property:

**4. Environmentally sensitive habitat area boundary determination.** The determination of the boundary of an environmentally sensitive habitat area shall occur during permit application review.

**a. ESH-GAV.**

(1) The requirements of this Section shall not apply to an application for a project if the Director determines that the proposed development is not located in an environmentally sensitive habitat area or if fuel modification activity is determined by the County Fire Department to be necessary to create an adequate defensible space around an **existing** structure or an **existing** agricultural resource as a result of a site specific safety zone calculation and the particular characteristics of the property.

The Fire Safe Council believes that this recommended language will continue to allow for the protection of environmentally sensitive habitats, provide for the regulation of brush removal and fuel management, and give the professionals in the Fire Department the authority to determine appropriate defensible space distances to protect private property. This proposed language can meet the desired requirements of most insurance companies who insure private property in these wildland areas, result in a positive impact on the public's safety, and protect the environment.

Finally, the Fire Safe Council does support the creation of a Community Wildfire Protection Plan in the Gaviota Community Plan Area.

We appreciate to opportunity to comment on these important life safety issues. If there is additional information you require, do not hesitate to contact us directly.

Sincerely

John Ahlman, Chair

CC: Members of the Board of Supervisors