

BOARD OF FORESTRY AND FIRE PROTECTION

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David Lackie
Interim Deputy Director
Long Range Planning Division
County of Santa Barbara Planning and Development
123 E. Anapamu Street
Santa Barbara, CA 93101

November 7, 2014

Dear Mr. Lackie:

The State Board of Forestry and Fire Protection (Board) is required to review and provide recommendations to the safety element of county and local government general plans when such plans are being amended. This review is in accordance with Government Code (GC) §65302.5, which requires the Board to review the fire safety elements when the general plans contains State Responsibility Areas or Very High Fire Hazard Severity Zones.

In order to more effectively evaluate County Safety Elements in the context of other local planning efforts, the fire hazards in the planning area, and ongoing fire protection projects, the Board enlists the assistance of staff from the local CAL FIRE Unit or contract county in reviewing the submitted Safety Element. The Santa Barbara County Fire Department has communicated to the Board significant issues with the submitted Draft Safety Element including:

- References to programs and plans that are outdated or defunct
- No supporting maps for the planning area, especially CAL FIRE's Fire Hazard Severity Zone Maps
- Inconsistencies with the Santa Barbara Unit Strategic Fire Plan and incompatible programs
- Implementation measures 9-11 missing

In addition, the Board believes the submitted Draft Safety Element does not meet the requirements and intent of SB 1241. The policies and implementation measures stated in the Draft Safety Element hinge on an over-reliance on enforcing state and local fire protection ordinances and codes. Rather, those policies and implementation measures should address ways in which development in Santa Barbara County will recognize and respond to the wildfire risk in a given project area, as well as opportunities to reduce risk to existing nonconforming structures and developments or vulnerable populations. They should be consistent with implementation measures in other plans such as the Santa Barbara Unit Strategic Fire Plan and the Multi-Jurisdiction Hazard Mitigation Plan.

The Board of Forestry and Fire Protection highly recommends the Planning and Development Department revisit the Santa Barbara Safety Element with assistance from Captain Martin Johnson, SBC Fire, and Chief Pete Muñoa's staff in the CAL FIRE Land Use program. Attached is the Assessment that is used by the Board and local Units to evaluate submitted Safety Elements from counties, which can be used as a guide to revise the Draft Safety Element. Captain Johnson and Chief Muñoa's contact information is below, as is information for Board staff, Edith Hannigan, who can assist with any questions.

Government Code §65302.5 requires Santa Barbara County to consider and accept the recommendations made by the Board and communicate in writing to the Board its reasons for not accepting any recommendations.

Thank you for the opportunity to participate in your planning process and we look forward to working with you on these recommendations. We hope this input leads to greater protection and reduced cost and losses from wildfires to Santa Barbara County and adjacent wildlands.

Sincerely,

A handwritten signature in blue ink, appearing to read "Keith Gilles", is written over a light blue horizontal line.

Keith Gilles
Chair, Board of Forestry and Fire Protection

CC: Captain Martin Johnson, martin.johnson@sbcfire.com, (805) 794-0615
Chief Pete Muñoa, pete.munoa@fire.ca.gov, (916) 324-0014
Edith Hannigan, edith.hannigan@bof.ca.gov, (916) 653-2928

Enclosure: General Plan Safety Element Assessment Template Version 1

[NAME OF AGENCY]

[NAME OF REVIEWING UNIT]

**General Plan Safety Element
Assessment
Version 1**

[DATE]

**Board of Forestry and Fire
Protection**



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August 2014

Purpose and Background: The State Board of Forestry and Fire Protection (BOF/Board) is required to review and make recommendations for the fire safety element of general plan updates in accordance with Government Code (GC) §65302.5. The review and recommendations apply to those general plans with State Responsibility Area (SRA) (Public Resources Code 4125) or Very High Fire Hazard Severity Zones (VHFHSZ) (GC 51175).

The statutory requirements for the Board review and recommendations pursuant to GC 65302.5 (a)(1) and (2), and (b) are as follows:

- *“The draft elements...to the fire safety element of a county’s or a city’s general plan...shall be submitted to the Board at least 90 days prior to... the adoption or amendment to the safety element of its general plan [for each county or city with SRA or VHFHSZ].”*
- *“The Board shall... review the draft or an existing safety element and report its written recommendations to the planning agency within 60 days of its receipt of the draft or existing safety element....”*
- *“Prior to adoption of the draft element..., the Board of Supervisors... shall consider the recommendations made by the Board... If the Board of Supervisors...determines not to accept all or some of the recommendations..., the Board of Supervisors... shall communicate in writing to the Board its reasons for not accepting the recommendations.”*

Methodology for Review and Recommendations: The Board established a standardized method to review the safety element of general plans. The methodology includes 1) examining the general plan for inclusion of factors that are important for mitigation of fire hazard and risks, and 2) making recommendations related to these factors. The evaluation factors and recommendations were developed using CAL FIRE technical documents and input from local fire departments.

Enclosed is the most expansive set of recommendations suggested by the Board. These recommendations are directed at communities that include:

- Most counties
- Widespread Very High Fire Hazard Severity Zone acreage and/or State Responsibility Area acreage
- Extensive financial and physical resources
- Broad community support
- Previous wildfire protection planning efforts

The General Plan Safety Element of each jurisdiction that fits those criteria will be assessed based on the recommendations below.

Review Process and Timeline

The county, local jurisdiction, and local fire unit will receive and review technical guidance documents, the BOF checklist, and other relevant information from the Governor's Office of Planning and Research and CAL FIRE.



The county or local jurisdiction will work closely with the local fire unit during the development of the general plan and the safety element in particular.



90 days prior to the adoption or amendment of the General Plan: The county or local jurisdiction will submit the safety element to the Board of Forestry for review.



No more than 30 days later: The Board will work with the unit to develop findings and recommendations.



No more than 60 days later: The Board will consider the fire unit's recommendations and will approve or approve with amendments the recommendations at the next Board meeting.

Standard List of General Plan Safety Element Recommendations

Please click on the appropriate box to “check” whether the plan satisfies each point. Standard recommendations are included in the checklist but please highlight or add additional comments as necessary.

1.0 Wildfire Protection Planning

1.1 General Plan references and incorporates County or Unit Fire Plan. Yes Partial No

Recommendation: Identify, reference or create (if necessary) a fire plan for the geographic scope of the General Plan. General Plan should incorporate the general concepts and standards from any county fire plan, fire protection agency (federal or state) fire plan, and local hazard mitigation plan. Identify or reference the local Unit Fire Plan and, if applicable, the Community Wildfire Prevention Plan.

Priority: High Medium Low N/A

Recommendation: Ensure fire plans incorporated by reference into the contain evaluations of fire hazards, assessment of assets at risk, prioritization of hazard mitigation actions, and implementation and monitoring components.

Priority: High Medium Low N/A

Additional Wildfire Protection Planning Recommendations:

2.0 Land Use Planning:

2.1 Goals and policies include mitigation of fire hazard for future development. Yes Partial No

Recommendation: Establish goals and policies for specific ordinances addressing evacuation and emergency vehicle access; water supplies and fire flow; fuel modification for defensible space; and home addressing and signing.

Priority: High Medium Low N/A

Recommendation: Specify the local ordinances, code sections, or regulations addressing the above standards, particularly any ordinances that address right-of-way, easement, and other reasonable offsite and onsite improvements for a division of land which qualifies for a Parcel Map rather than a Tentative/Final Map under the Subdivision Map Act.

Priority: High Medium Low N/A

Recommendation: Develop fire safe development codes used as standards for fire protection for new development in State Responsibility Area (SRA) within the entity’s jurisdiction that meet or exceed statewide standards in Title14 California Code of Regulations Section 1270 et seq.

Priority: High Medium Low N/A

Recommendation: Adopt, and have certified by the BOF, local fire safe ordinances which meet or exceed standards in 14 CCR § 1270 for State Responsibility Area.

Priority: High Medium Low N/A

Recommendation: Consider mitigation of previously developed areas that do not meet Title 14 California Code of Regulations Section 1270 et seq. or equivalent local ordinance.

Priority: High Medium Low N/A

- 2.2 Disclose wildland urban interface hazards, including Fire Hazard Severity Zone designations and other vulnerable areas as determined by CAL FIRE or fire prevention organizations. Describe or map any Firewise Communities or other firesafe communities as determined by the National Fire Protection Association, Fire Safe Council, or other organizations. Yes Partial No

Recommendation: Specify whether the entity has a Very High Fire Hazard Severity Zones (VHFHSZ) designation pursuant GC 51175 and include a map of the zones that clearly indicates any area designated VHFHSZ.

Priority: High Medium Low N/A

Recommendation: Adopt CAL FIRE recommended Fire Hazard Severity Zones including model ordinances developed by the Office of the State Fire Marshal for establishing VHFHSZ areas.

Priority: High Medium Low N/A

Recommendation: Discuss and/or include local fire hazard maps.

Priority: High Medium Low N/A

- 2.3 The design and location of new development provides for adequate infrastructure for the safe ingress of emergency response vehicles and simultaneously allows civilian egress during an emergency: Yes Partial No

Recommendation: Develop a policy that approval of parcel maps and tentative maps is conditional based on meeting regulations adopted pursuant to §4290 and 4291 of the Public Resources Code, particularly those regarding road standards for ingress, egress, and fire equipment access.

Priority: High Medium Low N/A

Recommendation: Develop pre-plans for fire prone areas that address civilian evacuations to temporary safety locations.

Priority: High Medium Low N/A

- 2.4 When approving parcel maps and use permits, consideration is given to providing adequate water supply infrastructure that meets zoning and fire protection needs. Yes Partial No

Recommendation: Develop a policy that approval of parcel maps is conditional based on

meeting zoning requirements and fire safe development codes.

Priority: High Medium Low N/A

Additional Land Use Planning Recommendations:

3.0 Housing/Structures and Neighborhoods:

3.1 Incorporation of current fire safe building codes. Yes Partial No

Recommendation: Adopt building codes for new development in State Responsibility Areas or incorporated areas with VHFHSZ that are based on those established by the Office of the State Fire Marshal in Title 19 and Title 24 CCR, referred to as the “Wildland Urban Interface Building Codes.”

Priority: High Medium Low N/A

3.2 Identification and actions for substandard fire safe housing and neighborhoods relative to fire hazard area. Yes Partial No

Recommendation: Identify and map existing housing structures that do not conform to contemporary fire standards in terms of building materials, perimeter access, and vegetative hazards in VHFHSZ or SRA by fire hazard zone designation.

Priority: High Medium Low N/A

Recommendation: Identify plans and actions to improve substandard housing structures and neighborhoods. Plans and actions should include structural rehabilitation, occupancy reduction, demolition, reconstruction, neighborhood –wide fuels hazard reduction projects, community education, and other community based solutions.

Priority: High Medium Low N/A

Recommendation: Identify plans and actions for existing residential structures and neighborhoods, and particularly substandard residential structures and neighborhoods, to be improved to meet current fire safe ordinances pertaining to access, water flow, signing, and vegetation clearing.

Priority: High Medium Low N/A

3.3 Consideration of diverse occupancies and their effects on wildfire protection.

Yes Partial No

Recommendation: Ensure risks to uniquely occupied structures, such as seasonally occupied homes, multiple dwelling structures, or other structures with unique occupancy characteristics, are considered for appropriate and unique wildfire protection needs.

Priority: High Medium Low N/A

3.4 Fire engineering features for structures in VHFHSZ. Yes Partial No

Recommendation: Ensure new development proposals contain specific fire protection plans, actions, and codes for fire engineering features for structures in VHFHSZ. Examples include codes requiring automatic sprinklers in VHFHSZ.

Priority: High Medium Low N/A

Additional Housing/Structures and Neighborhoods Recommendations:

4.0 Conservation and Open Space:

4.1 Identification of critical natural resource values relative to fire hazard areas. Yes Partial No

Recommendation: Identify critical natural resources and other “open space” values within the geographic scope of the General Plan.

Priority: High Medium Low N/A

4.2 Inclusion of resource management activities to enhance protection of open space and natural resource values. Yes Partial No

Recommendation: Develop plans and action items for vegetation management that provides fire damage mitigation and protection of open space values. Plans should address protection of natural resource financial values, establishment of fire resilient natural resources, protection of watershed qualities, and protection of endangered species habitats. Actions should consider prescribed burning, fuel breaks, and vegetation thinning and removal

Priority: High Medium Low N/A

Recommendation: Establish goals and policies for reducing the wildland fire hazards within the entity’s boundaries, especially on vacant residential lots and greenbelts and, with the relevant partners, on adjacent private wildlands or federal lands with fire hazards that threaten the entity’s jurisdiction.

Priority: High Medium Low N/A

4.3 Integration of open space into fire safety effectiveness. Yes Partial No

Recommendation: Establish goals and policies for incorporating systematic fire protection improvements for open space. Specifics policies should address facilitation of safe fire suppression tactics, standards for adequate access for firefighting, fire mitigation planning with agencies/private landowners managing open space adjacent to the GP area, water sources for fire suppression, and other fire prevention and suppression needs.

Priority: High Medium Low N/A

4.4 Urban forestry plans relative to fire protection. Yes Partial No

Recommendation: Ensure residential areas have appropriate fire resistant landscapes and discontinuous vegetation adjacent to open space or wildland areas.

Priority: High Medium Low N/A

Recommendation: Evaluate and resolve existing laws and local ordinances which conflict with fire protection requirements. Examples include conflicts with vegetation hazard reduction ordinances and listed species habitat protection requirements.

Priority: High Medium Low N/A

- 4.5 Mitigation for unique pest, disease and other forest health issues leading to hazardous situations. Yes Partial No

Recommendation: Establish goals and policies that address unique pest, disease, exotic species and other forest health issues in open space areas for purposes of reducing fire hazard and supporting ecological integrity.

Priority: High Medium Low N/A

Additional Conservation and Open Space Recommendations:

5.0 Circulation and Access:

- 5.1 Adequate access to high hazard wildland/open space areas. Yes Partial No

Recommendation: Establish goals and policies for adequate access in Very High Fire Hazard Severity Zones that meet or exceed standards in Title 14 CCR 1270 for lands with no structures, and maintain conditions of access in a suitable fashion for suppression access or public evacuation.

Priority: High Medium Low N/A

- 5.2 Standards for evacuation of residential areas in high hazard areas. Yes Partial No

Recommendation: Goals and policies should be established to delineate residential evacuation routes and evacuation plans in high or very high fire hazard residential areas.

Priority: High Medium Low N/A

- 5.3 Incorporate a policy that provides for a fuel maintenance program along roadways in the agency having jurisdiction. Yes Partial No

Recommendation: Develop an adaptive vegetation management plan that considers fuels, topography, weather (prevailing winds and wind event specific to the area), fire ignitions and

fire history.

Priority: High Medium Low N/A

- 5.4 Adequacy of existing and future transportation system to incorporate fire infrastructure elements. Yes Partial No

Recommendation: Establish goals and policies for proposed and existing transportation systems to facilitate fire infrastructure elements such as turnouts, helispots and safety zones.

Priority: High Medium Low N/A

Additional Circulation and Access Recommendations:

6.0 Defensible Space

- 6.1 Develop geographic specific fire risk reduction mitigation measures using fuel modification. Yes Partial No

Recommendation: Include policies and recommendations that incorporate fire safe buffers and greenbelts as part of the development planning. Ensure that land uses designated near very fire hazard severity zones are compatible with wildland fire protection strategies/capabilities.

Priority: High Medium Low N/A

- 6.2 Fuel modification around homes. Yes Partial No

Recommendation: Establish ordinances in SRA or VHFHSZ for vegetation fire hazard reduction around structures that meet or exceed the Board of Forestry and Fire Protection's Defensible Space Guidelines for SRA and the Very High Fire Hazard severity zones, including vacant lots.

See http://www.bof.fire.ca.gov/pdfs/Copyof4291finalguidelines9_29_06.pdf

Priority: High Medium Low N/A

Recommendation: Reduce fuel around communities and subdivisions, considering fuels, topography, weather (prevailing winds and wind event specific to the area), fire ignitions and fire history.

Priority: High Medium Low N/A

- 6.3 Fire suppression defense zones. Yes Partial No

Recommendation: Establish goals and policies that create wildfire defense zones for emergency services, including fuel breaks or other staging areas where WUI firefighting tactics could be most effectively deployed.

Priority: High Medium Low N/A

Additional Defensible Space Recommendations:

7.0 Emergency Services:

7.1 Map/describe existing emergency service facilities and areas lacking services, specifically noting any areas in SRA or VHFHSZs. Yes Partial No

Recommendation: Include descriptions of emergency services including available equipment, personnel, and maps of facility locations.

Priority: High Medium Low N/A

Recommendation: Initiate studies and analyses to identify appropriate staffing levels and equipment needs commensurate with the current and projected emergency response environment.

Priority: High Medium Low N/A

7.2 Assessment and projection of future emergency service needs. Yes Partial No

Recommendation: Ensure new development includes appropriate facilities, equipment, personnel and capacity to assist and support wildfire suppression emergency service needs. Future emergency service needs should be:

- Established consistent with state or national standards.
- Developed based on criteria for determining suppression resource allocation that includes elements such as identified values and assets at risk, ignition density, vegetation type and condition, as well as local weather and topography.
- Local Agency Formation municipal services reviews for evaluating level of service, response times, equipment condition levels and other relevant emergency service information.

Priority: High Medium Low N/A

7.3 Adequacy of training. Yes Partial No

Recommendation: Establish goals and policies for emergency service training that meets or exceeds state or national standards.

Priority: High Medium Low N/A

7.4 Inter-fire service coordination preparedness/mutual aid and multi-jurisdictional fire service agreements. Yes Partial No

Recommendation: Adopt the Standardized Emergency Management System for responding to large scale disasters requiring a multi-agency response. Ensure and review mutual aid/automatic aid and other cooperative agreements with adjoining emergency service providers.

Priority: High Medium Low N/A

Additional Emergency Services Recommendations:

8.0 Post Fire Safety, Recovery and Maintenance:

The post fire recommendations address an opportunity for the community and landowners to re-evaluate land uses and practices that affect future wildfire hazards and risk. They also provide for immediate post-fire life and safety considerations to mitigate potential losses to life, human assets and critical natural resources.

8.1 Evaluation of redevelopment. Yes Partial No

Recommendation: In High and Very hazardous areas, ensure redevelopment utilizes state of the art fire resistant building and development standards to improve past ‘substandard’ fire safe conditions.

Priority: High Medium Low N/A

8.2 Long term maintenance of fire hazard reduction mitigation projects. Yes Partial No

Recommendation: Provide polices and goals for maintenance of the post-fire-recovery projects, activities, or infrastructure.

Priority: High Medium Low N/A

8.3 Reevaluate hazardous conditions and provide for future fire safe conditions. Yes Partial No

Recommendation: Incorporate goals and policies that provide for reassessment of fire hazards following wildfire events. Adjust fire prevention and suppression needs for both short and long term fire protection.

Priority: High Medium Low N/A

Recommendation: Develop burn area recovery plans that incorporate strategic fire safe measures developed during the fire suppression, such as access roads, fire lines, safety zones, and fuelbreaks, and helispots.

Priority: High Medium Low N/A

8.4 Post fire life and safety assessments. Yes Partial No

Recommendation: Develop frameworks for rapid post-fire assessment and project implementation to minimize flooding, protect water quality, limit sediment flows and reduce other risks on all land ownerships impacted by wildland fire.

Priority: High Medium Low N/A

Recommendation: Identity flood and landslide vulnerability areas related to post wildfire conditions.

Priority: High Medium Low N/A

Recommendation: Establish goals and policies that address the intersection of flood /landslide/post fire burn areas into long term public safety protection plans. These should include treatment assessment of fire related flood risk to life, methods to control storm runoff in burn areas, revegetation of burn areas, and drainage crossing maintenance.

Priority: High Medium Low N/A

Recommendation: Encourage rapid post-fire assessment, as appropriate, and project implementation to minimize flooding, protect water quality, limit sediment flows and reduce other risks on all land ownerships impacted by wildland fire.

Priority: High Medium Low N/A

8.5 Restore sustainable landscapes and restore functioning ecosystems. Yes Partial No

Recommendation: Develop burn area recovery plans, evaluation processes and implementation actions that encourage tree and biomass salvage, reforestation activities, create resilient and sustainable landscapes, and restore functioning ecosystems.

Priority: High Medium Low N/A

8.6 Incorporate wildlife habitat/endangered species considerations. Yes Partial No

Recommendation: Establish goals and policies for consideration of wildlife habitat/endangered species into long term fire area recovery and protection plans, including environmental protection agreements such as natural community conservation plans.

Priority: High Medium Low N/A

8.7 Native species reintroduction. Yes Partial No

Recommendation: Incorporate native species habitat needs as part of long term fire protection and fire restoration plans.

Priority: High Medium Low N/A

Additional Post Fire Safety, Recovery and Maintenance Recommendations:

9.0 Terrorist and homeland security impacts on wildfire protection:

These recommendations are included to address fire protection needs related to terrorist acts or other homeland security preparedness and response actions. Both preparedness and incident response can adversely impact fire protection. Adverse effects include substantially decreasing emergency resources' availability, responsiveness and effectiveness by diverting resources, interrupting communications, or restricting emergency access.

9.1 Emergency response barriers. Yes Partial No

Recommendation: Identify goals and policies that address vital access routes that if removed would prevent fire fighter access (bridges, dams, etc.). Develop an alternative emergency access plan for these areas.

Priority: High Medium Low N/A

9.2 Prioritizing asset protection from fire when faced with a lack of suppression forces.

Yes Partial No

Recommendation: Identify and prioritize protection needs for assets at risk in the absence of response forces.

Priority: High Medium Low N/A

Recommendation: Establish fire defense strategies (such as fire ignition resistant areas) that provide adequate fire protection without dependency on fire resources (both air and ground) and could serve as safety zones for the public or emergency support personnel.

Priority: High Medium Low N/A

9.3 Communication channels during incidents. Yes Partial No

Recommendation: Establish goals and policies consistent with the Governor's Blue Ribbon Fire Commission of 2005 for communications and interoperability. Example goals and policies should address fire personnel capability to communicate effectively across multiple frequency bands and update and expansion of current handheld and mobile radios used on major mutual aid incidents.

Priority: High Medium Low N/A

Additional Terrorist and Homeland Security Recommendations:

Additional Recommendations: