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October 1, 2018

Santa Barbara County Board of Supervisors
105 East Anapamu Street
Santa Barbara, CA 93101

Re: Santa Barbara County Fire Presentation/Vegetation Management

Dear Members of the Board,

After the Santa Barbara County Fire Department's presentation to the Board on October 2, 2018, we urge you to consider the following questions:

1. How would have an emphasis on wildland vegetation treatment as presented altered the behavior and loss of homes during the July, 2018, Holiday Fire in Goleta?¹
2. Why did the numerous prescribed burns in Ventura County conducted in the years prior to the 2018 Thomas Fire fail to protect the hardest hit communities in Ventura?²
3. If we focus on protecting lives and property rather than trying to control wildfires, how would that alter the current approach to reducing wildfire risk?³

Although we have not heard the verbal presentation that will accompany Santa Barbara County Fire's presentation on Tuesday, we find the lack of attention in their PowerPoint file on how to reduce the flammability of communities discouraging.⁴

The science is clear. The nearly exclusive focus on wildland vegetation treatments as portrayed in Santa Barbara County Fire's PowerPoint and the draft Goleta Valley CWPP fails to properly address the primary factors that are responsible for the greatest loss of life and property during wildfires. This is why the cited Vegetation Treatment Program PEIR from the California Board of Forestry has been delayed for years – a consistent failure to incorporate the science.

Sincerely,

Richard W. Halsey
Director

Footnotes

1. We have completed a preliminary analysis of the Holiday Fire and would be willing to provide this information to the Board during a collaborative workshop that involves members of the fire, science, and environmental communities.

The community burned in the Holiday Fire is within a well-known wind corridor. The fire was fueled by suburban vegetation, weedy grasses, and structures, *not wildland habitat*. A fuel break would not have been relevant in reducing the losses. Unfortunately, many of the homes remain vulnerable as they have flammable landscape plants, stacks of wood, and overhanging trees within defensible space zones. We also could not identify the presence of many basic structural fire safety features such as fire-resistant vents. We have pointed out the failure of the draft Goleta Valley CWPP in addressing these same issues: http://www.californiachaparral.org/images/Goleta_CWPP_Aug_29_2018.pdf

2. Please see our letter to Governor Brown. We discuss the failure of Ventura County's prescribed burns during the Thomas Fire:
http://www.californiachaparral.org/images/Gov_Brown_2017_Wildfires_V2_Final.pdf

3. Please see our letter to the California Board of Forestry that addresses the failure of the Vegetation Treatment Program PEIR in dealing with how to protect the loss of life and property during the most devastating wildfires:
http://www.californiachaparral.org/images/2017_Draft_VTP_CCI_comments_FINAL_II.pdf

4. From our review of the Santa Barbara County Fire's PowerPoint presentation, we have found a number of points of bias that either exaggerate or ignore important issues in order to prioritize wildland vegetation treatments.

For example, although the circle graph in slide 18 (areas of vegetation altered) appears dramatic, it is a misrepresentation. The County has no jurisdiction over the majority of the area illustrated. As a consequence, it significantly understates actual treatment areas. And while the fire intersections illustrated in slide 33 are accurate, they also misrepresent the totality of the data. Research has shown that previous fire scars frequently fail to stop fire movement during wind-driven fires, the ones that cause nearly all the damage and loss of life.

These and other slides in the presentation deflect the discussion from where it should be directed – how do we reduce the flammability of communities?

The value of science is that it looks at a full representative sample of the data, not just information that supports a particular hypothesis.

Again, we urge the Board to collect all the information to assist in developing sound wildfire policy. A collaborative workshop with representatives from the fire, scientific and environmental communities is essential to allow the Board to sort through all the varied perspectives.