

August 7, 2008

Planning Commission

ATTN: Cheryl Jones

County of San Diego
5201 Ruffin Road, Suite B
San Diego, CA 92123

Subject: Vegetation Management Plan Proposal (Item F, August 8, 2008)

Dear Chairman Riess and Members of the Commission:

Buena Vista Audubon appreciates the opportunity to comment on the County of San Diego Vegetation Management Plan Proposal (First Draft 07.18.08). We agree that the county must have a scientifically and professionally sound comprehensive plan in place to reduce the risk of catastrophic fire. We commend the Board for taking the first steps towards a comprehensive fire prevention strategy. I personally have lived in San Diego County for over forty years. During this most recent fire, my elderly parents and I watched with great anxiety as the house across the street from theirs burned to the ground. All of us here have a common stake in an effective fire prevention plan.

However, we are concerned that the Proposal's fundamental approach to fire prevention appears to run counter to current scientific and professional opinion. The principal recommendation in the Proposal is to rely on landscape-scale vegetation modification far from the urban / wild interface. However, the unanimous professional and scientific consensus appears to be that this approach is outdated, expensive, and of little use in the catastrophic Santa Ana conditions that fuel our wildfires.

San Diego County Government has a proud track record of soliciting and incorporating broadly-based sound science in its policy recommendations. We urge you to hold to that tradition here, and to broaden the scope of and participants in the working group addressing the crucial issue of county-wide planning for fire prevention. This current plan appears to have been drawn up by the Forest Area Safety Task Force. It seems that this group would be important to include in a planning effort, but the Forest Area Safety Task Force clearly does not currently include a representative range of points of view, even within land-management circles.

It is our opinion that the current proposed recommendations would likely be devastating to much of the habitat quality and diversity of San Diego County. This environmental degradation would apparently occur without a major improvement in catastrophic fire protection. Further, it is clear that the issue of environmental degradation from the Proposed Plan has not been addressed in any realistic or meaningful way. This is despite the tremendous amount of knowledge and expertise available in the County.

In summary, the current plan emphasizes landscape scale vegetation management, but apparently its main recommendation does not appear to be within the mainstream of

professional fire management opinion. Federal and State land management regimes have largely abandoned this kind of vegetation management as ineffective.

We are also concerned that the current plan ignores the major tools of:

- prevention (powerline modifications),
- zoning to keep houses out of fire-prone areas
- planning to make communities clustered and defensible
- housing construction standards to make houses defensible
- and for existing houses in risky areas, a sound plan for sheltering in place.

We appreciate the opportunity to comment on the draft plan at this early stage.

Sincerely,

Karen Messer
Conservation committee, Buena Vista Audubon Society.

cc: Board Offices
Chandra Wallar, LUEG
Eric Gibson, DPLU
Jeff Murphy, DPLU
Tom Oberbauer, DPLU