



County of San Diego

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DEPARTMENT OF PLANNING AND LAND USE FIRE SERVICES SECTION

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April 2, 2010

Board of Forestry and Fire Protection
Attn: George Gentry
Executive Officer
P.O. Box 944246
Sacramento, CA 94244-2460

Dear Sirs:

Thank you for the opportunity to review and comment on the 2010 Strategic Fire Plan for California. There are a number of recommendations and objectives listed in the document that we feel will better facilitate the treatment of vegetation to provide for improved health and safety for the people of California as well as assist in the management of the important vegetation communities for conservation values. However, we would also like to make comments on a portion of the document that we feel conflicts with the objectives and which may make management of vegetation more difficult.

Specifically, there are statements in the background section that we believe are not accurate and which will bias the thought process for vegetation management and hinder activities to that end. On page 5 in the background section, the document states at the beginning of the last paragraph the following: "Although there is ongoing research about just how much of California's forests are at risk of uncharacteristically severe fires due to climate change and past fire suppression, consensus has emerged among scientists that many chaparral shrubland ecosystems may have the opposite problem: That is, fires have been too frequent in many shrublands, especially those of southern

California, which are then at risk of type conversion from native species to invasives that can pose a fire threat every fire season." We strongly disagree with that statement. There is not a consensus that fires have occurred in southern California so that vegetation communities have been converted to invasive habitats. This statement appears to be based on the fact that a portion of San Diego County burned in 2003 and again in 2007. Initially, the areas that burned twice appeared to have had more annual plants growing the following season. However, reexamination of those locations indicate that chaparral that burned in both fires has remained as chaparral and is recovering. Furthermore, examination of aerial photographs of much of San Diego County from 1928 indicates that much of the chaparral and shrubland in San Diego County is currently much more dense than it was 80 years ago. At that time, more widely spaced shrublands with grassy openings as a result of heavy grazing was normal.

The County of San Diego held workshops in November and December of 2008 attended by vegetation management practitioners from CAL FIRE, the Forest Service and the Bureau of Land Management as well as scientists including Jon Keeley, Richard Minnich, and Phil Riggan and there was not consensus that shrublands are being converted to grasslands on a broad scale. We feel that this language in the background section of the State Strategic Fire Plan is not necessary and would impact our ability to obtain funding or carry out important vegetation treatment programs here. Furthermore, the statement conflicts with several of the goals and objectives, does not add any value to the discussion and should be deleted.

Second, we have a concern that the same page and discussion provides the impression that global climatic change is to blame for much of the situation that is occurring. It is our assertion that though climatic change may be occurring, the major cause of the size of fires in recent years have not been demonstrably attributed to global climate change, but to overstocking of forest and highly flammable shrub land vegetation that is old and affected by long term fire suppression.

It seems to be popular view to blame the entire California fire problem on climate, thereby relieving society from any obligation to manage wildland for fire. However, the major fires that occurred in the past 7 years were exacerbated by drought, however, the age of vegetation and unnatural density of the forests may have been as much a cause for

such large fires as was the drought period. Revision to the background section to reflect this may be appropriate.

Other sections of the document that we would especially like to support include under the Goals heading, page 8, item number 3 "Support and participate in the collaborative development and implementation of wildland fire protection plans and other local, county and regional plans that address fire protection and landowner objectives."

Under the Objectives heading, we strongly support number 3 b regarding the development of county or regional fire plans. Under Objective number 4 g, we strongly support the creation of incentives for retrofitting existing structures for ignition resistive building codes. We also strongly support Objective 5 b, though we feel that the statement in the background section regarding fires occurring too often in shrublands will reduce the ability to implement this objective. Objectives 5 e and 5 f are also important in this section in order to reduce the fear of vegetation treatments of any kind, even those that would enhance or provide better protection for natural resources as well as property and lives. We strongly agree with Objective 7. f. but it would also be adversely affected by the introductory background language regarding shrubland habitats.

Overall, we feel that the 2010 Strategic Fire Plan for California contains a variety of important and valuable goals and objectives. However, we also feel very strongly that the introductory background section needs to be revised to remove inaccurate language regarding consensus that fires have occurred so often that shrubland habitats are being replaced by weedy species. Its removal is also important to reduce its conflicts with the goals and objectives of the plan.

Yours in fire safety,

Ralph Steinhoff



Fire Services Coordinator
San Diego County Fire Authority